

TRIAL EXHIBIT 148

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

v.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through
10, inclusive,

Defendants.

CASE NO.: 2-23-cv-6302

EXPERT REPORT OF CHARLES L. BAUM, PH.D.

July 7, 2025

ECONOMIC LOSS APPRAISAL IN THE CASE OF MARK SNOOKAL

1. I am Charles L. Baum II, Ph.D., a professor of economics and finance at Middle Tennessee State University. I have a Ph.D. in economics from the University of North Carolina at Chapel Hill and a B.A. in political science and a B.A. in economics from Wake Forest University. My full curriculum vita is provided as Exhibit A. Neither I nor my opinions represent Middle Tennessee State University, the University of North Carolina at Chapel Hill, or Wake Forest University in this matter. I generate this report on behalf of Baum Economics LLC.

2. I have been asked to provide an analysis of the lost earnings and lost employment benefits for Mark Snookal (Mr. Snookal) due to disability discrimination and the rescission of a position in Nigeria by Chevron USA, Inc. (Chevron) in or around August 2019.
3. In return for this report, I am compensated at a rate of \$275 per hour by the plaintiff.
4. I am not asked to provide, nor do I plan to provide, an expert opinion on liability, legal issues, or the law. I attempt to follow guidance provided by case law in my calculations.
5. It is my understanding Mr. Snookal was born April 13, 1972, is a high school graduate, and lived in Los Angeles (Los Angeles County), California, with his wife, Constance (born July 24, 1972), and son, Benjamin (born September 5, 2006).
6. It is my understanding Mr. Snookal was hired by Chevron on January 12, 2009 as an analyzer designs engineer in the technical services department at the El Segundo refinery (designing and engineering functions for the installation of analyzer systems) and was promoted in 2011 to maintenance supervisor in the analyzer and digital group (creating and implementing three-year plans for needed changes and to improve performance), in 2013 to analyzer reliability improvement champion in the technical services department (developing and implementing the analyzer reliability program for the entire El Segundo facility), and in 2016 to instrumentation, electrical, and analyzer reliability team lead in the reliability department (leading a team responsible for inspecting, testing, and maintaining instrumentation and electrical and analyzer assets).
7. It is my understanding Mr. Snookal in 2019 applied for the position of reliability engineer manager (REM) in Nigeria, which would have had a grade-22 salary with a promotion to a grade-23 salary after no more than 6 months, and Chevron offered Mr. Snookal this position, to begin August 1, 2019.
8. It is my understanding Chevron soon thereafter rescinded its job offer for the reliability engineering manager position to Mr. Snookal.
9. It is my understanding Mr. Snookal later applied for three additional job openings at Chevron (i.e., operating assistant, general team lead, and maintenance change operating assistant) that would have constituted promotions, but these positions were offered to other workers.

10. It is my understanding Mr. Snookal was demoted by Chevron (to reliability change operating assistant, a non-supervisory position), which resulted in depression, and he changed employment in September 2021.
11. It is my understanding Mr. Snookal believes Chevron's recission of its job offer to him constitutes disability discrimination and is wrongful and in violation of California statutes and public policy.
12. It is my understanding Mr. Snookal just prior to leaving Chevron diligently searched for replacement employment in good faith and found another job working for Nippon Dynawave Packaging Co. as a maintenance superintendent from September 2021 to September 2023 and for Georgia Pacific beginning September 2023, where he remains currently employed.
13. According to documents I have reviewed, Mr. Snookal had taxable income of \$179,475 in 2021, \$143,145 in 2022, and \$179,623 in 2023.
14. According to documents I have reviewed, Mr. Snookal earned from Chevron in 2018 base pay equal to \$136,100 plus \$22,800 in company, unit, and individual performance incentives (or bonuses) (for a total of \$158,900 in wage and salary income, with performance incentives equal to 16.75 percent of base pay) with employee medical insurance contributions of \$4,560, employee dental insurance contributions of \$180 and \$120, employee vision insurance contributions of \$337, employer pension contributions of \$20,629, and employer ESIP benefits of \$12,612.
15. According to documents I have reviewed, Mr. Snookal with an assignment to Nigeria would have received a base salary of \$141,100 per year with company, unit, and individual performance incentives (or bonuses), additional pay for unused vacation days, a location premium (a base-pay adjustment factor of 55 percent), tax equalization payments on the location premium, and a travel allowance (with employment benefits calculated on base salary, not including the location premium or travel allowance). Mr. Snookal would have received the pay increase to \$141,100 per year with company, unit, and individual performance incentives in 2019 with or without the assignment to Nigeria.
16. According to documents I have reviewed, Mr. Snookal had earnings from Chevron of \$161,243.36 in 2019 and \$155,628.57 in 2020 with health insurance benefits, pension benefits, and employer ESIP contributions equal to up to 8 percent of earnings.
17. According to documents I have reviewed, Mr. Snookal's pension benefits through

Chevron would have equaled 11 percent of highest average-five earnings multiplied by years of service up to age 60 plus 14 percent of highest average-five earnings multiplied by years of service beyond age 60 as a lump sum with retirement between the ages of 60 and 65.

18. According to documents I have reviewed, Mr. Snookal received a base salary of \$150,000 per year from Nippon Dynawave Packaging Company (in year-2021 dollars), with the ability to earn a bonus targeted to be 20 percent of earnings, health insurance benefits, and retirement benefits equal to 3 to 4 percent of earnings.
19. It is my understanding Mr. Snookal receives a base salary of \$180,000 per year from Georgia Pacific (in year-2024 dollars), with the ability to earn a bonus targeted to be 2 to 3 percent of earnings, health insurance benefits, and retirement benefits equal to up to 8.5 to 10.5 percent of earnings.
20. In this analysis, based on the assumption that paragraphs 5-19 are true, I calculate the economic losses to Mr. Snookal in the form of lost earnings and lost employment benefits due to disability discrimination and the recission of a position in Nigeria (i.e., the reliability engineering manager position) by Chevron.
21. **The present value of the economic losses to Mr. Snookal is calculated to range from \$2,564,653 (from the position recission but no promotion to a grade-23 salary) to \$3,321,301 (from the recission of the position in Nigeria with the promotion to a grade-23 salary).**
22. The case-related documents used to prepare this analysis are listed in Exhibit B and other references are listed in Exhibit C.
23. Federal courts in Ninth Circuit employment cases allow recovery for lost earnings as part of the process of making the injured party whole (*Albemarle Paper Co. v. Moody*, 422 U.S. 405, 418, 95 S.Ct. 2362, 2372, 45 L.Ed.2d 280 (1975)). Lost pay from the time of the discrimination to the trial (back pay) and after the trial (front pay) are both recoverable (*Thorne v. City of El Segundo*, 802 F.2d 1131, 1136 (9th Cir.1986); *Cassino v. Reichhold Chemicals, Inc.*, 817 F.2d 1338, 1346 (9th Cir.1987); Baum, 2021).
24. Lost employment benefits, such as insurance and retirement benefits, are recoverable in Ninth Circuit employment cases (*Cassino v. Reichhold Chemicals, Inc.*, 817 F.2d 1338, 1348 (9th Cir.1987); *Kelly v. Am. Standard, Inc.*, 640 F.2d 974, 985 (9th Cir.1981)). The pecuniary value for employee benefits is typically measured by the actual cost to employers (*Galindo v. Stooddy*, 793 F.2d 1502,

1517 (9th Cir.1986)). Health and life insurance in the Ninth Circuit are valued differently—as out-of-pocket replacement costs incurred by the terminated plaintiff, rather than the cost of the premiums to the terminating employer (*E.E.O.C. v. Farmer Bros. Co.*, 31 F.3d 891, 902 (9th Cir.1994)). If the terminated worker did not replace the lost health insurance, then the medical costs while uninsured that would have been paid by the defendant’s insurance plan may be awarded as damages as well.

25. The economic loss is the present value of the difference in Mr. Snookal’s projected earnings and employment benefits at Chevron absent Chevron’s recission of the position in Nigeria minus his actual and projected earnings and employment benefits from Chevron and subsequent employment.
26. A projected trial date of August 19, 2025 is used to develop a calculation of the economic losses.
27. The first part of the calculation is the loss from the pre-trial period, which is August 1, 2019 (the date of Chevron’s recission of the position in Nigeria) through August 19, 2025. The second part is the loss from the post-trial period from August 20, 2025 through February 23, 2035, which is the period represented by Mr. Snookal’s remaining worklife expectancy (13.47 years) from the time he changed jobs (Skoog, Ciecka, and Krueger, 2019). Worklife expectancies are derived from Markov increment-decrement models, which are based on survival probabilities calculated using the U.S. Life Tables and employment transition probabilities calculated with Current Population Survey (CPS) data.
28. In a first scenario, shown in Table 1, I assume Mr. Snookal absent Chevron’s wrongdoing is transferred to a position in Nigeria with a location premium of 55 percent on base pay by August 1, 2019 (but that he is not then promoted to a grade-23 salary position). I project Mr. Snookal absent Chevron’s wrongdoing would have continued earning \$161,243.36 per year (in year-2019 dollars), which equals Mr. Snookal’s earnings from Chevron in 2019, the last full calendar year before he changed employment. Mr. Snookal’s base pay of \$141,100 with company, unit, and individual performance incentives equal to 16.75 percent of base pay is \$164,734 per year.
29. Mr. Snookal’s future earnings are assumed to grow over time with price inflation and productivity (Becker, 1975; Ben-Porath, 1967; Gilbert, 1997). Wages tend to increase over time with prices to maintain purchasing power, and wages tend to increase over time as workers become more productive with the newest and latest technologies. Workers also become more productive over their careers as they acquire work experience and learn new skills on the job.

30. I project future wage inflation using a rate of 3.33 percent per year. Over the past 10 years, the average annual growth rate in weekly earnings for production and nonsupervisory employees in the private sector in the Current Employment Statistics (CES), in the wages and salaries of all civilian workers in the Employment Cost Index (ECI), and in wages for covered workers reported by the Social Security Administration (SSA) has been 3.63 percent, and over the past 20 years, the average rate of annual wage growth in CES, ECI, and SSA data has been 3.13 percent (Bureau of Labor Statistics, 2024a, 2024b). The Congressional Budget Office forecasts wage growth for civilian workers of 3.00 percent per year in 10 years, and the Social Security Advisory Board predicts long-term wage growth for covered workers of 3.56 percent annually (Congressional Budget Office, 2024; Social Security Trustees Report, 2024).
31. I include the value of lost employment benefits in the economic loss calculations.
32. I include the value of supplemental pay for 25 unused vacation days (multiplied by a factor of 1.4, as per Chevron policy) and the value of tax equalization benefits on the location premium (valued at 13.53 percent of the location premium or 7.44 percent of base pay, according to Chevron's remuneration report for Mr. Snookal).
33. I project Mr. Snookal absent Chevron's wrongdoing would have continued receiving employer ESIP contributions equal to 8 percent of earnings.
34. I project Mr. Snookal, absent Chevron's wrongdoing, would have continued receiving government-mandated employment benefits. Government-mandated employment benefits equal the employer-paid portion of the payroll tax (OASDI), which is 6.2 percent of earnings up to the Social Security wage base, which is \$137,700 for 2020, \$142,800 for 2021, \$147,000 for 2022, \$160,200 for 2023, and \$168,600 for 2024 for the Social Security's Old-Age, Survivors, and Disability Insurance program (Social Security Administration, 2024a). The 1.45 percent payroll tax for Medicare is not included in the economic losses. Future Social Security wages bases are assumed to increase at the rate of price inflation.
35. Future price inflation is projected to be 2.50 percent per year. Over the past 10 years, the average rate of annual price inflation, as measured by the Consumer Price Index, has been 2.74 percent, and over the past 20 years, it has been 2.57 percent per year (Bureau of Labor Statistics, 2024c). The Congressional Budget Office forecasts price inflation of 2.30 percent annually in 10 years, and the Social Security Advisory Board predicts long-term price inflation of 2.40 percent per year (Congressional Budget Office, 2024; Social Security Trustees Report, 2024).

36. I deduct from the economic losses Mr. Snookal's actual and projected earnings and the value of employment benefits from Chevron (without a transfer to a position in Nigeria) and subsequent employment. This equals \$161,243.36 in 2019, \$155,628.57 in 2020, \$179,475 in 2021, \$143,145 in 2022, and \$179,623 in 2023, with Chevron ESIP benefits equal to 8 percent of earnings from Chevron, employer-matching retirement contributions equal to 4 percent of earnings from Nippon Dynawave Packaging Co., and employer-matching retirement contributions equal to 9.5 percent of earnings from Georgia Pacific and with employer Social Security contributions from all employers equal to 6.2 percent of earnings up to the Social Security wage base, described above. Thereafter, I project Mr. Snookal earns \$180,000 per year (in year-2023 dollars) from Georgia Pacific with a 3 percent bonus. As before, I project Mr. Snookal's earnings to increase at the rate of wage growth, described above.
37. Throughout the analysis, losses are adjusted for the annual probability Mr. Snookal would have remained employed by Chevron in each future year of the analysis (see estimation procedures in Baum, 2013). These annual probabilities are calculated using regression model parameters estimated with data collected by the Bureau of Labor Statistics through the National Longitudinal Survey of Youth. These estimates are adjusted for and are specific to Mr. Snookal's gender, age, education level, wage rate, occupation, and tenure with the defendants and are adjusted for economic conditions. Shown in the Tables is the yearly survival probability for the period from 2025 throughout the analysis with Chevron. The survival probability is derived from annual hazard rates. The hazard rate is the conditional probability Mr. Snookal's employment for the defendant would have ended in a particular year. The survivor rate is the cumulative of the hazard rates and is the probability Mr. Snookal would have remained employed for the defendant for a particular duration given his tenure.
38. I project Mr. Snookal absent Chevron's wrongdoing would have received a lump sum pension benefit from Chevron upon retirement at the end of his worklife expectancy equal to \$764,191, based on a high average-five earnings of \$263,002 and 25.74 years of service.
39. I deduct from the economic losses the lump-sum pension benefit from Chevron Mr. Snookal will receive with Chevron's wrongdoing at the end of his worklife expectancy, which equals \$210,227, based on a high average-five earnings of \$151,251 and 12.64 years of service.
40. I assume Mr. Snookal receives comparable medical, dental, and vision insurance benefits from Chevron and subsequent employment.

41. Future economic losses should be discounted to present cash value in federal employment cases (*Jones & Laughlin Steel Corp. v. Pfeifer*, 462 U.S. 523, 533 (1983)). This is because an amount of money paid today if invested can grow over time with interest. The present value of a future loss is the amount today needed to equal that future sum with growth from investment interest. The U.S. Supreme Court has determined the rate of interest used for present-value discounting should be that on “the best and safest investments.” The Ninth Circuit does not specify a rate for present-value discounting, and several approaches may be used (*Gauthier v. Eastern Oregon Correctional Institution*, 2006 WL 2728957, at *4 (D.Ore.2006)).
42. Future dollar values are discounted to present value using a rate of 3.41 percent. Over the past 10 years, the average interest rate on 1-year treasury bills, 10-year treasury notes, and 20-year treasury bonds has been 2.17 percent, and over the past 20 years, the average interest rate on 1-year treasury bills, 10-year treasury notes, and 20-year treasury bonds has been 2.66 percent (Board of Governors of the Federal Reserve System, 2024). The Congressional Budget Office forecasts interest rates on 10-year treasury notes to be 4.10 percent in 10 years, and the Social Security Advisory Board predicts long-term interest rates on a mix of treasury securities to be 4.70 percent (Congressional Budget Office, 2024; Social Security Trustees Report, 2024).
43. Just as a lump sum paid today can grow when invested with interest to a larger amount in the future—which motivates present value discounting of future losses—past losses could have grown to a larger amount today if invested with interest. The economic theory of the time value of money suggests past losses should be increased due to the ability to earn interest (just as future losses should be reduced to present value due to the ability to earn interest, discussed below). Pre-judgment interest makes wronged plaintiffs whole by reimbursing for the lost use of funds.
44. Courts in the Ninth Circuit have the discretion to include pre-judgment interest in the economic losses (*Domingo v. New England Fish Co.*, 727 F.2d 1429, 1446 (9th Cir.1984)). The court in the Ninth Circuit also retains discretion over the rate to use for pre-judgment interest (*W. Pac. Fisheries, Inv. v. SS President Grant*, 730 F.2d 1280, 1288 (9th Cir.1984)). Although different interest rates have been used (including state statutory rates and the IRS rates in 26 U.S.C. § 6621), the federal post-judgement rate specified in 28 U.S.C. § 1961—the rate on 52-week treasury bills—is preferred for pre-judgment interest in the Ninth Circuit (*Blankenship v. Liberty Life Assur. Co. of Boston*, 486 F.3d 620, 628 (9th Cir.2007)).

45. Presented in Table 1, the present value of the economic losses from lost earnings and lost employment benefits for Mr. Snookal due to disability discrimination and the recission of the reliability engineering manager position by Chevron is calculated to be \$2,564,653.
46. In a second scenario, shown in Table 2, I assume Mr. Snookal absent Chevron's wrongdoing is transferred to a position in Nigeria with a location premium of 55 percent of base pay by August 1, 2019, and he is then promoted to a grade-23 salary position by January 1, 2020, with Mr. Snookal receiving 85 percent of a 16 percent increase in grade pay. Employment and pension benefits are adjusted accordingly. As before, in this scenario, I include the value of supplemental pay for 25 unused vacation days (multiplied by a factor of 1.4, as per Chevron policy) and the value of tax equalization benefits on the location premium (valued at 13.53 percent of the location premium or 7.44 percent of base pay, according to Chevron's remuneration report for Mr. Snookal). Otherwise, I use the same methodology and make the same assumptions as in my first scenario. In this second scenario, the present value of the economic losses from lost earnings and employment benefits for Mr. Snookal due to disability discrimination and the recission of the reliability engineering manager position by Chevron is calculated to be \$3,321,301.
47. Given the documents and information provided by Mr. Snookal and his attorneys and given the applicable economic information available for the analysis, I believe these calculations and this analysis to be reasonable and reflective of the economic circumstances of this case.
48. I reserve the right to revise this report if or when additional information becomes available.



Charles L. Baum, Ph.D.
Baum Economics LLC, Member
cbaum@baumeconomics.com
(615) 556-9287

Table 1: Economic Losses from Lost Earnings and Lost Employment Benefits for Mr. Snookal

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>
<u>Year</u>	<u>Wage</u> <u>Growth</u> <u>Rate</u>	<u>Chevron</u> <u>Earnings</u> <u>and</u> <u>Performanc</u> <u>e Pay</u>	<u>Chevron</u> <u>Supplementa</u> <u>I Vacation</u> <u>Pay</u>	<u>Chevron</u> <u>Location</u> <u>Premiums</u>	<u>Chevron</u> <u>Tax</u> <u>Equalizatio</u> <u>n Benefit on</u> <u>Location</u> <u>Premium</u>	<u>Chevron ESIP</u> <u>Contribution</u> <u>\$</u>	<u>Chevron</u> <u>Employer</u> <u>Social</u> <u>Security</u> <u>Contribution</u> <u>\$</u>	<u>Actual</u> <u>Earnings,</u> <u>Performanc</u> <u>e Pay, and</u> <u>Bonuses</u>	<u>Actual</u> <u>Retirement</u> <u>Benefits (or</u> <u>ESIP</u> <u>Contributions</u> <u>)</u>	<u>Actual</u> <u>Employer</u> <u>Social</u> <u>Security</u> <u>Contribution</u> <u>\$</u>	<u>Loss</u>	<u>Tenure</u> <u>Prob.</u>	<u>Chevron</u> <u>Pension</u> <u>Benefits</u>	<u>Actual</u> <u>Chevron</u> <u>Pension</u> <u>Benefits</u>
Past														
2019	3.22	161,243	6,442	31,650	4,999	12,899	8,240	161,243	12,899	8,240	43,090	1.000	0	0
2020	3.82	155,629	14,923	73,314	11,579	12,450	8,537	155,629	12,450	8,537	99,817	1.000	0	0
2021	6.20	177,781	17,047	83,749	13,227	14,222	8,854	179,475	11,965	8,854	114,587	1.000	0	0
2022	5.47	187,509	17,980	88,332	13,951	15,001	9,114	143,145	5,726	8,875	174,142	1.000	0	0
2023	4.34	195,639	18,760	92,162	14,556	15,651	9,932	179,623	10,478	9,932	146,666	1.000	0	0
2024	3.33	202,153	19,385	95,231	15,040	16,172	10,453	185,400	17,613	10,453	144,968	1.000	0	0
2025	3.33	132,199	12,677	62,276	9,836	10,576	6,781	121,243	11,518	6,781	94,802	1.000	0	0
Future														
2025	3.33	76,687	7,354	36,126	5,705	6,135	3,934	70,331	6,681	3,934	54,994	0.989	0	0
2026	3.33	215,841	20,697	101,679	16,059	17,267	10,982	197,953	18,806	10,982	154,784	0.969	0	0
2027	3.33	223,029	21,386	105,065	16,593	17,842	11,257	204,545	19,432	11,257	159,938	0.947	0	0
2028	3.33	230,455	22,098	108,563	17,146	18,436	11,538	211,356	20,079	11,538	165,264	0.932	0	0
2029	3.33	238,130	22,834	112,179	17,717	19,050	11,827	218,395	20,747	11,827	170,768	0.912	0	0
2030	3.33	246,059	23,595	115,914	18,307	19,685	12,123	225,667	21,438	12,123	176,454	0.892	0	0
2031	3.33	254,253	24,380	119,774	18,916	20,340	12,426	233,182	22,152	12,426	182,330	0.873	0	0
2032	3.33	262,720	25,192	123,763	19,546	21,018	12,736	240,947	22,890	12,736	188,402	0.854	0	0
2033	3.33	271,468	26,031	127,884	20,197	21,717	13,055	248,970	23,652	13,055	194,676	0.835	0	0
2034	3.33	280,508	26,898	132,142	20,870	22,441	13,381	257,261	24,440	13,381	201,158	0.817	0	0
2035	3.33	42,882	4,112	20,201	3,190	3,431	2,659	39,328	3,736	2,438	30,972	0.815	770,084	210,227

<u>1</u>	<u>16</u>	<u>17</u>	<u>18</u>	<u>19</u>	<u>20</u>	<u>21</u>	<u>22</u>	<u>23</u>
<u>Year</u>	<u>Adjusted Loss</u>	<u>Interest</u>	<u>Total Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past								
2019	43,090	0	43,090	N/A	2.05	N/A	43,090	43,090
2020	99,817	164	99,980	N/A	0.38	N/A	99,980	143,071
2021	114,587	149	114,736	N/A	0.10	N/A	114,736	257,806
2022	174,142	7,294	181,436	N/A	2.79	N/A	181,436	439,242
2023	146,666	22,497	169,163	N/A	5.08	N/A	169,163	608,406
2024	144,968	30,142	175,110	N/A	5.08	N/A	175,110	783,516
2025	94,802	23,635	118,437	N/A	5.08	N/A	118,437	901,953
Future								
2025	54,388	0	54,388	0.37	3.41	0.99	53,723	955,676
2026	150,021	0	150,021	1.00	3.41	0.96	143,299	1,098,975
2027	151,461	0	151,461	1.00	3.41	0.92	139,904	1,238,879
2028	153,996	0	153,996	1.00	3.41	0.89	137,555	1,376,434
2029	155,679	0	155,679	1.00	3.41	0.86	134,472	1,510,906
2030	157,380	0	157,380	1.00	3.41	0.84	131,459	1,642,365
2031	159,099	0	159,099	1.00	3.41	0.81	128,513	1,770,878
2032	160,837	0	160,837	1.00	3.41	0.78	125,633	1,896,510
2033	162,594	0	162,594	1.00	3.41	0.76	122,817	2,019,328
2034	164,371	0	164,371	1.00	3.41	0.73	120,065	2,139,392
2035	585,084	0	585,084	0.15	3.41	0.73	425,260	2,564,653

Table 2: Economic Losses from Lost Earnings and Lost Employment Benefits for Mr. Snookal

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>
<u>Year</u>	<u>Wage</u> <u>Growth</u> <u>Rate</u>	<u>Chevron</u> <u>Earnings</u> <u>and</u> <u>Performanc</u> <u>e Pay</u>	<u>Chevron</u> <u>Supplementa</u> <u>I Vacation</u> <u>Pay</u>	<u>Chevron</u> <u>Location</u> <u>Premiums</u>	<u>Chevron</u> <u>Tax</u> <u>Equalizatio</u> <u>n Benefit on</u> <u>Location</u> <u>Premium</u>	<u>Chevron ESIP</u> <u>Contribution</u> <u>\$</u>	<u>Chevron</u> <u>Employer</u> <u>Social</u> <u>Security</u> <u>Contribution</u> <u>\$</u>	<u>Actual</u> <u>Earnings,</u> <u>Performanc</u> <u>e Pay, and</u> <u>Bonuses</u>	<u>Actual</u> <u>Retirement</u> <u>Benefits (or</u> <u>ESIP</u> <u>Contributions</u> <u>)</u>	<u>Actual</u> <u>Employer</u> <u>Social</u> <u>Security</u> <u>Contribution</u> <u>\$</u>	<u>Loss</u>	<u>Tenure</u> <u>Prob.</u>	<u>Chevron</u> <u>Pension</u> <u>Benefits</u>	<u>Actual</u> <u>Chevron</u> <u>Pension</u> <u>Benefits</u>
Past														
2019	3.22	161,243	6,442	31,650	4,999	12,899	8,240	161,243	12,899	8,240	43,090	1.000	0	0
2020	3.82	176,795	16,953	83,285	13,154	14,144	8,537	155,629	12,450	8,537	136,250	1.000	0	0
2021	6.20	201,959	19,366	95,139	15,026	16,157	8,854	179,475	11,965	8,854	156,206	1.000	0	0
2022	5.47	213,011	20,426	100,346	15,848	17,041	9,114	143,145	5,726	8,875	218,039	1.000	0	0
2023	4.34	222,246	21,311	104,696	16,535	17,780	9,932	179,623	10,478	9,932	192,466	1.000	0	0
2024	3.33	229,646	22,021	108,182	17,086	18,372	10,453	185,400	17,613	10,453	192,294	1.000	0	0
2025	3.33	150,178	14,401	70,746	11,173	12,014	6,781	121,243	11,518	6,781	125,751	1.000	0	0
Future														
2025	3.33	87,116	8,354	41,039	6,481	6,969	3,934	70,331	6,681	3,934	72,946	0.989	0	0
2026	3.33	245,195	23,512	115,507	18,243	19,616	10,982	197,953	18,806	10,982	205,314	0.969	0	0
2027	3.33	253,360	24,295	119,354	18,850	20,269	11,257	204,545	19,432	11,257	212,151	0.947	0	0
2028	3.33	261,797	25,104	123,328	19,478	20,944	11,538	211,356	20,079	11,538	219,216	0.932	0	0
2029	3.33	270,515	25,940	127,435	20,126	21,641	11,827	218,395	20,747	11,827	226,515	0.912	0	0
2030	3.33	279,523	26,804	131,679	20,797	22,362	12,123	225,667	21,438	12,123	234,058	0.892	0	0
2031	3.33	288,831	27,696	136,063	21,489	23,107	12,426	233,182	22,152	12,426	241,852	0.873	0	0
2032	3.33	298,450	28,618	140,594	22,205	23,876	12,736	240,947	22,890	12,736	249,906	0.854	0	0
2033	3.33	308,388	29,571	145,276	22,944	24,671	13,055	248,970	23,652	13,055	258,228	0.835	0	0
2034	3.33	318,657	30,556	150,114	23,708	25,493	13,381	257,261	24,440	13,381	266,827	0.817	0	0
2035	3.33	48,714	4,671	22,948	3,624	3,897	3,020	39,328	3,736	2,438	41,372	0.815	874,816	210,227

<u>1</u>	<u>16</u>	<u>17</u>	<u>18</u>	<u>19</u>	<u>20</u>	<u>21</u>	<u>22</u>	<u>23</u>
<u>Year</u>	<u>Adjusted Loss</u>	<u>Interest</u>	<u>Total Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past								
2019	43,090	0	43,090	N/A	2.05	N/A	43,090	43,090
2020	136,250	164	136,414	N/A	0.38	N/A	136,414	179,505
2021	156,206	187	156,393	N/A	0.10	N/A	156,393	335,898
2022	218,039	9,505	227,544	N/A	2.79	N/A	227,544	563,442
2023	192,466	28,854	221,320	N/A	5.08	N/A	221,320	784,762
2024	192,294	38,885	231,179	N/A	5.08	N/A	231,179	1,015,941
2025	125,751	30,663	156,414	N/A	5.08	N/A	156,414	1,172,355
Future								
2025	72,144	0	72,144	0.37	3.41	0.99	71,261	1,243,616
2026	198,996	0	198,996	1.00	3.41	0.96	190,079	1,433,695
2027	200,906	0	200,906	1.00	3.41	0.92	185,576	1,619,272
2028	204,269	0	204,269	1.00	3.41	0.89	182,460	1,801,732
2029	206,501	0	206,501	1.00	3.41	0.86	178,371	1,980,103
2030	208,757	0	208,757	1.00	3.41	0.84	174,374	2,154,477
2031	211,037	0	211,037	1.00	3.41	0.81	170,466	2,324,943
2032	213,343	0	213,343	1.00	3.41	0.78	166,646	2,491,589
2033	215,674	0	215,674	1.00	3.41	0.76	162,911	2,654,500
2034	218,030	0	218,030	1.00	3.41	0.73	159,260	2,813,761
2035	698,287	0	698,287	0.15	3.41	0.73	507,540	3,321,301

Notes to the Tables

1. Year. The projected trial date is August 19, 2025.
2. Wage growth rate.
3. Chevron earnings and performance pay (without wrongdoing).
4. Chevron supplemental vacation pay (without wrongdoing).
5. Chevron location premium (without wrongdoing).
6. Chevron tax equalization benefit on location premium (without wrongdoing)
7. Chevron employer ESIP contributions (without wrongdoing).
8. Chevron employer Social Security contributions (without wrongdoing).
9. Actual Chevron and replacement earnings, performance pay, and bonuses.
10. Actual Chevron and replacement employer retirement contributions (or ESIP contributions).
11. Actual Chevron and replacement employer Social Security contributions.
12. Loss equals projected Chevron earnings and employment benefits absent Chevron's wrongdoing minus actual and projected replacement earnings and employment benefits.
13. Tenure is the probability of continued employment with Chevron.
14. Chevron pension benefits (without wrongdoing).
15. Actual Chevron pension benefits.
16. Adjusted loss is loss adjusted for the probability of continued employment with Chevron plus the difference in Chevron pension benefits.
17. Pre-judgment interest.
18. Total loss is adjusted loss plus pre-judgment interest.
19. Discount period.
20. Discount rate.
21. Discount factor.
22. Present value of economic losses.
23. Cumulative present value of economic losses.

Exhibit A: Charles Baum's Resume

CHARLES L. BAUM II, Ph.D.

2930 Cherry Blossom Lane
Murfreesboro, Tennessee 37129
cbaum@baumeconomics.com
W: 615-556-9287

EMPLOYMENT

Middle Tennessee State University

Professor of Economics (2010-present)

Chair, Department of Economics and Finance (2008-2014)

Associate Professor of Economics (2004-2010)

Director of the Economics Graduate Programs (2004-2008)

Assistant Professor of Economics (1999-2004)

Baum Economics LLC

Member (2015-present)

EDUCATION

Ph.D., Economics, University of North Carolina at Chapel Hill (1999)

B.A., Economics, Wake Forest University (1995)

B.A., Political Science, Wake Forest University (1995)

RESEARCH INTERESTS / SPECIALTIES: Labor Economics, Employment, Wages, Earnings, Employment Benefits, Unemployment, Retirement Decisions, Worklife Expectancies, Social Security Income and Benefits, Business Valuations, Profits, Business Income, Antitrust Economics, Price-Fixing, and Predatory Pricing

TESTIMONY (DEPOSITION AND TRIAL)**

**Last five years (2018-2024), in reverse order; pre-2018 testimony available upon request.

IN THE STATE COURT OF DEKALB COUNTY, STATE OF GEORGIA, BEVERLY
THOMAS and TONY THOMAS, Plaintiffs, v. JOHN DOE NO. 1, JOHN DOE NO.

2, JANE DOE NO. 1, JANE DOE NO. 2, ABC COMPANY, and LEONA BLACKMON, Defendants. Civil Action File No.: 23-A-03427. June 27, 2025. (Deposition).

IN THE CIRCUIT COURT OF THE 9TH JUDICIAL CIRCUIT IN AND FOR ORANGE COUNTY, FLORIDA, JASMINE ELMAHDI, as Personal Representative of the Estate of Ashraf Salah Elmahadi, Plaintiff, v. AYMAN A. DAOUK, M.D.; DAOUK ORTHOPAEDICS, PLLC; SAND LAKE SURGICENTER, LLC d/b/a SAND LAKE SURGERY CENTER; SCA-SAND LAKE, LLC; and SURGICAL CARE AFFILIATES, LLC, Defendants. General Jurisdiction Division. June 27, 2025. (Deposition).

STATE OF WISCONSIN, CIRCUIT COURT, WAUPACA COUNTY, MILES J. OSMAN, a minor, by his Guardian ad Litem, KEVIN R. MARTIN, and BRYANA BRETTE ROE, Individually, and MASON OSMAN, Individually, Plaintiffs, v. STATE OF WISCONSIN, DEPARTMENT OF HEALTH AND FAMILY SERVICES, THEDACARE, INC. d/b/a THEDACARE, THEDACARE MEDICAL CENTER – WAUPACA, INC. d/b/a THEDACARE, CHARLES RATHJEN, M.D., SHI HAN OH, M.D., MMIC INSURANCE, INC. f/k/a MIDWEST MEDICAL INS. CO., THE DOCTORS' COMPANY, and INJURED PATIENTS AND FAMILIES COMPENSATION FUND, Defendants. Case No.: 2024-CV-000034. June 18, 2025. (Deposition).

IN THE CIRCUIT COURT OF THE 4TH JUDICIAL CIRCUIT IN AND FOR DUVAL COUNTY, FLORIDA, GABRIELLE WILLIAMS, Plaintiff, v. CURAHEALTH JACKSONVILLE, LLC, AARON WEST, M.D., AARON J. WEST, M.D., P.A., SHEILA CASABAR, FAWZI FARHA, M.D., FIRST COAST SURGICAL ASSOCIATES, INC., FAWZI FARHA, M.D., INC., SEBASTIAN STANCUI, M.D., BRIAN COOPER, M.D., TAWANA THOMAS, M.D., and FIRST COAST INFECTIOUS DISEASE CONSULTANTS, LLC, Defendants. June 17, 2025. (Deposition).

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, COUNTY DEPARTMENT, LAW DIVISION, KEARI LUBERNORT, a minor by his Mother and Next Friend, KERARA DAVIS, and KERARA DAVIS, individually, Plaintiffs, v. ADVOCATE HEALTH AND HOSPITALS CORPORATION a/k/a ADVOCATE CHRIST MEDICAL CENTER a/k/a ADVOCATE MEDICAL GROUP and ADVOCATE HEALTH CARE NETWORK a/k/a ADVOCATE HEALTH CARE, Defendants. Case No.: 2022-L008840. June 4, 2025. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ALABAMA, QUENTIN WATTS, Plaintiff, v. J & L INDUSTRIAL SERVICES, LLC, Defendant. CASE NO.: 1:24-cv-50. May 21, 2025. (Trial).

UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF LOUISIANA, MONROE DIVISION, LIONEL HUNTER, Plaintiff, v. TC ENERGY CORPORATION; COLUMBIA GULF TRANSMISSION, LLC; TRANSCANADA USA SERVICES, INC.; TRANSCANADA USA PIPELINE SERVICES, LLC, Defendants. Civil Action No.: 3:23-cv-00328. May 20, 2025. (Deposition).

SUPERIOR COURT OF NEW JERSEY, Nasir Memudu, Administrator Ad Prosequendum and General Administrator of the Estate of Najim Memudu, Deceased, Plaintiff, v. Joshua M. Gonzalez, W. Campbell Holdings, LLC, Campbell Freightliner of Orange County LLC, Campbell Group Associates LLC, Campbell Supply Company, Khawaja A. Hameed, A-1 Limousine, Inc., and John Does, Defendants. LAW DIVISION: MIDDLESEX COUNTY, Docket No. 008102-20, Civil Action. May 20, 2025. (Trial).

UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF LOUISIANA, STEVIE LEE CLARK, Plaintiff, v. ACE AMERICAN INSURANCE COMPANY, SAFELITE GROUP, INC., SAFELITE SOLUTIONS, LLC, and JOHNNY POOL, Defendants. Civil Action No.: 5-24-cv-00272. May 20, 2025. (Deposition).

STATE OF WISCONSIN, CIRCUIT COURT, WOOD COUNTY, KAYSON KIGGINS, a minor, by his Guardian ad Litem, KEVIN R. MARTIN, and NILA KIGGINS, Individually, and TANNER KIGGINS, Individually, Plaintiffs, and STATE OF WISCONSIN, DEPARTMENT OF HEALTH SERVICES and ASPIRUS HEALTH PLAN, INC., Involuntary Plaintiffs, v. MARSHFIELD CLINIC HEALTH SYSTEM, INC. d/b/a MARSHFIELD MEDICAL CENTER – WESTON d/b/a MARSHFIELD MEDICAL CENTER, MARSHFIELD CLINIC, INC., d/b/a MARSHFIELD MEDICAL CENTER – WESTON d/b/a MARSHFIELD MEDICAL CENTER, BENJAMIN FAUSTICH, M.D., and INJURED PATIENTS AND FAMILIES COMPENSATION FUND, Defendants. Case No.: 2024-cv-000145. May 14, 2025. (Deposition).

IN THE FIFTH CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE AT NASHVILLE, EDWARD FLYNN as husband and next of kin for his wife, NANCY FLYNN, deceased, individually and on behalf of the wrongful death beneficiaries of NANCY FLYNN, Plaintiff, v. HTI MEMORIAL HOSPITAL CORPORATION d/b/a TRISTAR SKYLINE MEDICAL CENTER, MIDDLE TENNESSEE HOSPITALISTS, PLC, MIDDLE TENNESSEE PULMONARY ASSOCIATES, PLC, DUSTIN H. MINIX, M.D., TOBY RAY SMITH, M.D., SOCTT R.

DALRYMPLE, P.A., KELLY WAYNE WOODS, M.D., and BRANDY M. CAMPERLINO, A.P.R.N., Defendants. Case No.: 21-c-1899. April 25, 2025. (Deposition).

IN THE CIRCUIT COURT OF THE CITY OF SAINT LOUIS, 22ND JUDICIAL CIRCUIT, STATE OF MISSOURI, CHRISTOPHER M. ELLIS; and KELLI ELLIS, Plaintiffs, v. ERIC C. LEUTHARDT, M.D., THE WASHINGTON UNIVERSITY, MONTERIS MEDICAL CORPORATION, MONTERIS MEDICAL HOLDINGS, INC., MONTERIS MEDICAL US, INC., Defendants. Case No.: 1922-cc-11957. April 11, 2025. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, BRANDON WRIGHT, individually, on behalf of his minor children, and as next of kin for JESSICA WRIGHT, deceased, Plaintiff, v. CONTINENTAL AEROSPACE TECHNOLOGIES, INC., CONTINENTAL MOTORS, INC., CONTINENTAL MOTORS SERVICES, INC., and DIRECT FLIGHT SOLUTIONS, LLC, Defendants. April 10, 2025. (Trial).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, BRIAN HUETHER, Individually, and as Administrator of THE ESTATE OF SHELLI HUETHER, Plaintiff, v. CONTINENTAL AEROSPACE TECHNOLOGIES, INC., CONTINENTAL MOTORS, INC., CONTINENTAL MOTORS GROUP LIMITED, CONTINENTAL MOTORS SERVICES, INC., and DIRECT FLIGHT SOLUTIONS LLC, Defendants. Case No.: 21-C-1508. April 10, 2025. (Trial).

STATE OF WISCONSIN CIRCUIT COURT, BROWN COUNTY, OLIVER JOEL ETRINGER, a minor, by his Guardian ad Litem, KEVIN R. MARTIN, and ERIC PENZA, Individually, and JEFFREY ETRINGER, Individually, Plaintiffs, and STATE OF WISCONSIN, DEPARTMENT OF HEALTH AND FAMILY SERVICES, and UNITED HEALTHCARE OF WISCONSIN, INC., Involuntary Plaintiffs, v. BAYCARE AURORA, LLC d/b/a AURORA BAYCARE, AURORA MEDICAL GROUP, INC., KELLY MALLOY, M.D., CONTINENTAL CASUALTY COMPANY, and INJURED PATIENTS AND FAMILIES COMPENSATION FUND, Defendants. Case No.: 2023-CV-001639. March 28, 2025. (Deposition).

IN THE CIRCUIT COURT OF TENNESSEE FOR THE THIRIETH JUDICIAL DISTRICT AT MEMPHIS, LONZO PARKER, Plaintiff, v. WILLIAM MIHALKO, M.D., CAMPBELL CLINIC, P.C., A Tennessee Professional Corporation and CAMPBELL CLINIC HOLDINGS, P.C., A Tennessee Professional Corporation, Defendants. Docket No.: CT-04553-21. Division VI. March 20, 2025. (Deposition).

IN THE CIRCUIT COURT FOR SUMNER COUNTY, TENNESSEE AT GALLATIN, LATONYA TREADAWAY, and husband, GARY TREADAWAY, Plaintiff, v. SUZANNA CHATTERJEE, M.D., and SUMNER REGIONAL MEDICAL CENTER, LLC., Defendants. No. 2015-CV-924. March 19, 2025. (Trial).

IN THE CIRCUIT COURT FOR JEFFERSON COUNTY, ALABAMA, MAYLON SPRUELL and KRISTI SPRUELL, Plaintiffs, v. DR. JOHN TOULIATOS; ADVANCED SURGEONS, P.C.; DR. STEVEN NICHOLS; ANDREWS SPORTS MEDICINE, P.C.; and ST. VINCENTS HOSPITAL, Defendants. Civil Action No.: 01-CV-2022-903519.00. March 14, 2025. (Deposition).

IN THE CIRCUIT COURT OF TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS, LORETTA MARTIN, and her Husband, JAMES MARTIN, Plaintiffs, v. ROLANDO TOYOS, M.D., WEST TENNESSEE EYE CARE, P.C., A Tennessee Professional Corporation, TOYOS CLINIC, TOYOS FOUNDATION, INC., A Tennessee Corporation, EYE RX, ALISON M. MOORE, O.D., JESSICA B. ARMSTRONG, O.D., and HAYLIE MULLINIKS, O.D., Defendants. Docket No.: CT-4253-22. March 14, 2025. (Deposition).

IN THE CIRCUIT COURT OF BRADLEY COUNTY, TENNESSEE, MARGARET LEA SULLINS, Plaintiff, v. COURTNEY BRAMLETT, O.D., G. SETH FORD, M.D., CLEVELAND EYE CLINIC, P.C., LIEZELLE GURGENS, M.D., MEMORIAL HEALTH PARTNERS, INC. and MEMORIAL HEALTH PARTNERS FOUNDATION, INC., Defendants. CASE NO.: v-22-342. February 28, 2025. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, COLUMBIA DIVISION, JAMES DARRELL BEARD, Plaintiff, v. HICKMAN COUNTY GOVERNMENT, Defendant. February 26, 2025. (Trial).

STATE OF FLORIDA, DIVISION OF ADMINISTRATIVE HEARINGS, ESTATE OF CHRISTOPHER PAPPALARDO, Plaintiff, v. UNIVERSITY COMMUNITY HOSPITAL, INC., d/b/a ADVENT HEALTH TAMPA and JOHN A. DIETRICK, M.D., Defendants. CASE NO.: 24-2940MA. February 25, 2025. (Arbitration).

IN THE CIRCUIT COURT OF FOR THE FOURTEENTH JUDICIAL DISTRICT OF THE STATE OF TENNESSEE AT MANCHESTER, DANNY USELTON, Surviving Spouse of SHUKITA USELTON, Plaintiff, v. TENNOVA HEALTHCARE-HARTON, TULLAHOMA HMA LLC, HOWARD BENNETT, M.D., and JOSEPH THOMASSON, JR., M.D., Defendants. Docket No. 2021-cv-47244. February 24, 2025. (Trial).

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA, MARK SNOOKAL, an individual, Plaintiff, v. CHEVRON USA, INC., a California Corporation, and DOES 1 through 10, inclusive, Defendants. CASE NO.: 2-23-cv-6302. February 10, 2025. (Deposition).

STATE OF FLORIDA, DIVISION OF ADMINISTRATIVE HEARINGS, ESTATE OF CHRISTOPHER PAPPALARDO, Plaintiff, v. UNIVERSITY COMMUNITY HOSPITAL, INC., d/b/a ADVENT HEALTH TAMPA and JOHN A. DIETRICK, M.D., Defendants. CASE NO.: 24-2940MA. February 3, 2025. (Deposition).

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF ALABAMA, MOBILE DIVISION, AUSTIN J. RAPPUHN, Plaintiffs, v. PRIMAL VANTAGE COMPANY, INC., ROGERS SPORTING GOODS HOLDING, INC., and DOE DEFENDANTS #1-5, Defendants. Civil Action No.: 1-cv-2020-00528. January 17, 2025. (Deposition).

IN THE CIRCUIT COURT OF THE 18th JUDICIAL CIRCUIT IN AND FOR BREVARD COUNTY, FLORIDA, DEBORAH WRIGHT, Plaintiff, v. 10 ROADS EXPRESS, LLC; 10 ROADS CAPITAL, LLC; and RASHEEM AHMED BUIE, Defendants. Case No.: 5-2023-CA-020573. January 16, 2025. (Deposition).

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY FLORIDA, Natalia Prieto Vazquez, a minor and by and through her parent FERNANDO PRIETO and MONICA VAZQUEZ GARCIA, Plaintiffs, v. GULLIVER PREPARATORY SCHOOL, INC., A Florida non-profit corporation, and VIDA HARGRETT, Defendants. Case No.: 2023-010038-CA-01. January 14, 2025. (Deposition).

IN THE STATE COURT OF DEKALB COUNTY, STATE OF GEORGIA, BRIANNA BROWN, Individually, and as Parent and Next Friend of GRAYSON JOHNSON, a disabled minor, Plaintiffs, v. EMORY HEALTHCARE INC.; EMORY UNIVERSITY HOSPITAL MIDTOWN (f/k/a EMORY CRAWFORD LONG HOSPITAL); EMORY HEALTHCARE NETWORK; GEORGIA CENTER FOR WOMEN; TRACEY R. LEMON, M.D. (a/k/a TRACEY R. LEMON-SAMS, M.D.; TRACEY LEMON, M.D., P.C., and JOHN/JANE DOE(S) 1-5; Defendants. CIVIL ACTION, File No.: 2021-A-02564. December 17, 2024. (Deposition).

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, DEXTER WELCH, Plaintiff, v. UNITED NETWORK FOR ORGAN SHARING; and VANDERBILT UNIVERSITY MEDICAL CENTER, Defendants, Civil Action No.: 3:24-cv-00422. December 16, 2024. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA, UNITED STATES OF AMERICA and STATE OF TENNESSEE, *ex rel.* JULIE ADAMS, M.D., STEPHEN ADAMS, M.D., and SCOTT STEINMANN, M.D., Plaintiffs, v. CHATTANOOGA-HAMILTON COUNTY HOSPITAL AUTHORITY, d/b/a Erlanger Medical Center and Erlanger Health System, *et al.*, Defendants. Case No.: 1:21-cv-84-TRM-SKL. December 11, 2024. (Deposition).

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, COUNTY DEPARTMENT, LAW DIVISION, PRINCETON THOMAS, a minor by and through the Guardian of his Estate, OLD NATIONAL BANK, and TAWANNA FERGUSON, Individually, Plaintiffs, v. RUSH UNIVERSITY MEDICAL CENTER a/k/a RUSH UNIVERSITY MEDICAL GROUP a/k/a RUSH UNIVERSITY HOSPITAL a/k/a RUSH UNIVERSITY, and GARY LOY, M.D., Defendants. Case No.: 2022-L-011012. December 10, 2024. (Deposition).

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND, ANDREW M. FRANKLIN, JR., Plaintiff, v. ADVENTIST HEALTHCARE, INC. t/a ADVENTIST HEALTHCARE, Defendant. Case No.: C-15-CV-23-004459. December 2, 2024. (Deposition).

IN THE CIRCUIT COURT OF TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS, VICTORIA CORYNNE GREENSLATE, a minor child and ward, by and through VICTORIA GREENSLATE JACKSON and TINA HANEY, as Next Friends and Mother and Grandmother and Co-Conservators of VICTORIA CORYNNE GREENSLATE, Plaintiffs, v. METHODIST HEALTHCARE-MEMPHIS HOSPITALS d/b/a LE BONHEUR CHILDREN'S HOSPITAL; METHODIST LE BONHEUR HEALTHCARE d/b/a LEBONHEUR CHILDREN'S HOSPITAL; UT LE BONHEUR PEDIATRIC SPECIALISTS, INC.; ALEXANDRA LEE SCHALLER, D.O.; ANDREW SCHROEDER, M.D.; DIAGNOSTIC IMAGING PROFESSIONAL CORPORATION; and LOUIS S. PARVEY, M.D., Defendants. Case No.: CT-1417-22, Division VII. November 19, 2024. (Deposition).

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, COUNTY DEPARTMENT, LAW DIVISION, KEARI LUBERNORT, a minor by his Mother and Next Friend, KERARA DAVIS, and KERARA DAVIS, individually, Plaintiffs, v. ADVOCATE HEALTH AND HOSPITALS CORPORATION a/k/a ADVOCATE CHRIST MEDICAL CENTER a/k/a ADVOCATE MEDICAL GROUP and ADVOCATE HEALTH CARE NETWORK a/k/a ADVOCATE HEALTH CARE, Defendants. Case No.: 2022-L008840. October 23, 2024. (Deposition).

IN THE CIRCUIT COURT OF FOR THE FOURTEENTH JUDICIAL DISTRICT OF THE STATE OF TENNESSEE AT MANCHESTER, DANNY USELTON, Surviving Spouse of SHUKITA USELTON, Plaintiff, v. TENNOVA HEALTHCARE-HARTON, TULLAHOMA HMA LLC, HOWARD BENNETT, M.D., and JOSEPH THOMASSON, JR., M.D., Defendants. Docket No. 2021-cv-47244. October 17, 2024. (Deposition).

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE, CHRISTY GEDELMAN, Plaintiff, v. TENNESSEE ORTHOPAEDIC ALLIANCE, P.A., d/b/a TENNESSEE ORTHOPAEDIC CLINICS, Defendant. Case No.: 3-206-21. October 15, 2024. (Deposition).

IN THE CIRCUIT COURT OF BRADLEY COUNTY, TENNESSEE, MARGARET LEA SULLINS, Plaintiff, v. COURTNEY BRAMLETT, O.D., G. SETH FORD, M.D., CLEVELAND EYE CLINIC, P.C., LIEZELLE GURGENS, M.D., MEMORIAL HEALTH PARTNERS, INC. and MEMORIAL HEALTH PARTNERS FOUNDATION, INC., Defendants. CASE NO.: v-22-342. October 3, 2024. (Deposition).

IN THE COMMON PLEAS COURT OF HARDIN COUNTY, OHIO, SCOTT GERBER, Plaintiff, v. OHIO NORTHERN UNIVERSITY, OHIO NORTHERN UNIVERSITY BOARD OF TRUSTEES, and MEMBERS OF THE OHIO NORTHERN UNIVERSITY BOARD OF TRUSTEES ET AL., Defendants. Case No.: 2023 1107 CVH. October 1, 2024. (Deposition).

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA, HANSRAJI BAJNETH, Plaintiff, v. HENRY GEMBALA & ANNA FEATHERSTON, ANGELES EXPRESS APPLICANCES, INC., & NEW YORK MINUTE TRICKING, INC., Defendants. Case No.: 2023-CA-008463. September 25, 2024. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, BRANDON WRIGHT, individually, on behalf of his minor children, and as next of kin for JESSICA WRIGHT, deceased, Plaintiff, v. CONTINENTAL AEROSPACE TECHNOLOGIES, INC., CONTINENTAL MOTORS, INC., CONTINENTAL MOTORS SERVICES, INC., and DIRECT FLIGHT SOLUTIONS, LLC, Defendants. September 24, 2024. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, BRIAN HEUTHER, Individually, and as Administrator of THE ESTATE OF SHELLI HEUTHER, Plaintiff, v. CONTINENTAL AEROSPACE TECHNOLOGIES, INC., CONTINENTAL MOTORS, INC., CONTINENTAL MOTORS GROUP LIMITED,

CONTINENTAL MOTORS SERVICES, INC., and DIRECT FLIGHT SOLUTIONS LLC, Defendants. Case No.: 21-C-1508. September 24, 2024. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, SARAH HIGHTOWER, Plaintiff, v. JACOB COKER, Defendant. Docket No.: 23-C-1691. September 20, 2024. (Deposition).

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE, INDIA ARIANNA EMAGINE ELLIOTT, INDIVIDUALLY, and on behalf of and as Mother and Next of Kin of his infant son KAIDEN JAMIR RAYMEZ ELLIOTT, deceased, Plaintiff, v. PARKRIDGE MEDICAL CENTER, INC. d/b/a PARKRIDGE EAST HOSPITAL, CHATTANOOGA WOMEN'S SPECIALISTS, P.C., SAMANTHA CATER, D.O., SHARON LOVE, R.N., and LORI E. SALMON, R.N., Defendants. Case No.: 29-c-934. September 19, 2024. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE, IVELISSE RIVERA, Plaintiff, v. REP CORPORATION, Defendant. August 27, 2024. (Trial).

STATE OF WISCONSIN, CIRCUIT COURT, DANE COUNTY, EMERSON JAMES BELL, a minor, by his Guardian ad Litem, KEVIN R. MARTIN, and SARAH HUGHES, Individually, and GABRIEL BELL, Individually, Plaintiffs, and STATE OF WISCONSIN, DEPARTMENT OF HEALTH AND FAMILY SERVICES, Involuntary Plaintiffs, v. SSM HEALTH CARE OF WISCONSIN, INC. d/b/a SSM HEALTH ST MARY'S HOSPITAL MADISON; SSM HEALTH CARE OF WISCONSIN, INC. d/b/a SSM HEALTH DEAN MEDICAL GROUP; ELIZABETH STROM BLITON, M.D.; MAYA GROSS, M.D.; MMIC INSURANCE, INC. f/k/a MIDWEST MEDICAL INS. CO.; CONTINENTIAL CASUALTY COMPANY; and INJURED PATIENTS AND FAMILIES COMPENSATION FUND, Defendants. Case No.: 2023-CV-000825. August 15, 2024. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, SIXTEENTH JUDICIAL DISTRICT, RUTHERFORD COUNTY, ROBERT KURTZ, individually and as surviving spouse and next of kin of ALYSSA KURTZ, deceased, Plaintiff, v. MURFREESBORO MEDICAL CLINIC, P.A., CANDICE N. KEY, FNP-C, and CHLOE L. DESNOES, D.O., Defendants. Case No.: 80064. August 14, 2024. (Deposition).

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE, MICHELLE FORSHEE, Plaintiff, v. MINA LEASING AND FINANCIAL SERVICE, LLC, VENTURE EXPRESS, INC., MILLENNIAL TRANSPORT SERVICES, LLC, and

DAVID BRANDON LENOIR, Defendants. Case No.: 22-c-654. August 13, 2024. (Deposition).

AMERICAN ARBITRATION ASSOCIATION, NEW YORK CITY, NEW YORK, SEAN ARONSEN, INDIVIDUALLY AND DERIVATIVELY ON BEHALF OF GLENCO CONTRACTING GROUP, INC., Claimants, v. DAVID MCGRATH AND GLENCO CONTRACTING GROUP, INC., Respondents, AAA Case No.: 01-23-0001-1632. June 20, 2024. (Arbitration).

AMERICAN ARBITRATION ASSOCIATION, MIAMI REGIONAL OFFICE, Case Number: 01-21-0017-9580, THE ULTIMATE UMBRELLA COMPANY, INC., a Florida corporation, Claimant, v. THOMAS PARKER, an individual, THOMAS MATTHEW PARKER REVOCABLE TRUST AGREEMENT DATED FEBRUARY 21, 2020, a trust; CHARLES MUNROE, an individual; CHARLES MUNROE FAMILY TRUST DATED FEBRUARY 5, 2020, a trust; CYNTHIA MUNROE SLAT TRUST U/A/D OCTOBER 1, 2019, a trust; EDWARD USMAR, an individual; DOUGAN CLARKE, an individual; and 2019 CLARKE TRUST U/A/D FEBRUARY 26, 2019, respondents. June 17, 2024. (Arbitration).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, DAKOTA COCHRAN, Plaintiff, v. CITY OF LA VERGNE, TENNESSEE, Defendant. Case No.: 3:23-CV-000428. June 13, 2024. (Deposition).

IN THE GENERAL COURT OF JUSTICE, SUPERIOR COURT DIVISION, STATE OF NORTH CAROLINA, COUNTY OF ONSLOW, GEORGINA BELCHER, Plaintiff, v. ZOILO BERTREND GARDON-RAY and PLURIS HOLDINGS, LLC, Defendants. CASE NO.: 23-CVS-161. June 10, 2024. (Deposition).

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT IN AND FOR SAINT LUCIE COUNTY, FLORIDA, JOSEPH ROM, and ERIN ROM, as husband and wife, Plaintiff, v. AAA TRIPLE "S" SERVICES, INC., d/b/a STANLEY STEEMER, a for profit Corporation and JOHN DOE, an unknown employee, Defendants. Case No.: May 31, 2024. (Deposition).

IN COUNTY COURT AT LAW NUMBER THREE OF EL PASO COUNTY, TEXAS, MAURICIO CHONG, Plaintiff, v. SUNRISE RESTAURANTS, LLC, d/b/a DENNY'S, Defendant. CAUSE NO.: 2021-DCV-3302. May 29, 2024. (Deposition).

IN THE CIRCUIT COURT FOR HAMILTON COUNTY, TENNESSEE, THOMAS P. WILSON, Ph.D., individually and as surviving spouse of the Deceased, PENNI JO WILSON, Plaintiff, v. CHATTANOOGA-HAMILTON COUNTY HOSPITAL

AUTHORITY d/b/a ERLANGER HEALTHSYSTEM d/b/a ERLANGER NORTH HOSPITAL and LARRY D. STONE, M.D., Defendants. Case No.: 20-C-206. May 28, 2024. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE, NORTHERN DIVISION, KNOXVILLE UNITED STATES OF AMERICA ex. rel. PATRICK GRIFFIS, and PATRICK GRIFFIS, INDIVIDUALLY, Plaintiff, v. EOD TECHNOLOGY, INC. (n/k/a JANUS GLOBAL OPERATIONS LLC), Defendant. Civil Action No.: 3:10-cv-204. May 28, 2024. (Deposition).

IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS, KENNETH FIELDS, Plaintiff, v. SOUTHRN ELECTRIC & CONTROLS, LLC, and John Doe, Defendants. Case No. CT-004124-16, Div. III. May 21, 2024. (Deposition).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF TENNESSEE, CARLTON SPEER, MALENA DENNIS, and ZACHARIAH DUNCAN, on their own behalf and on behalf of all others similarly situated, Plaintiffs, v. UCOR LLC, Defendant. Case No.: 3:22-CV-000426-TRM-JEM. May 21, 2024. (Deposition).

IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, ELVIS J. MINIS, Plaintiff, v. THOMAS BUTERA and KATHERINE DAVENPORT, Defendants. Case No.: 2019-cv-75781. May 9, 2024. (Trial).

IN THE STATE COURT OF MUSCOGEE COUNTY, STATE OF GEORGIA, TOSHA WOMBLE and TEDDY WOMBLE, Individually, and as Parents and Next Friends of GREYSEN WOMBLE, a disabled, minor, Plaintiffs, v. PIEDMONT HEALTHCARE, INC.; PIEDMONT COLUMBUS REGIONAL MIDTOWN; TIMOTHY PAUL VILLEGAS, M.D.; CHARLES BABERE, M.D.; and JOHN/JANE DOE(S) 1-5; Defendants. CIVIL ACTION File No.: SC-2021-cv-001526. May 7, 2024. (Deposition).

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE, WANDA CATHERINE ELDAHAN, Plaintiff, v. LINCOLN MEMORIAL UNIVERSITY, Defendant. Case: 3:21-cv-00263-TAV-HBG. EEOC: 494-2022-02000. April 29, 2024. (Deposition).

IN THE CIRCUIT COURT OF WILLIAMSON COUNTY, TENNESSEE, PAULA RICHARDSON, as surviving spouse on behalf of her deceased husband, DAWSON RICHARDSON, JR., and individually, Plaintiff, v. KRISTINA BETHEL, D.O. and

EMERGI-TRUST, P.C., Defendants. Case No.: 22-cv-189. April 26, 2024.
(Deposition).

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, TENNESSEE AT
CLARKSVILLE, VERNON M. CARRIGAN, as surviving kin of DAVID
CARRIGAN, Plaintiff, v. AMERICAN FAMILY CARE TENNESSEE, LLC and,
ANDREA BELL WILLIS, M.D., Defendants. No. CC-15-CV-1610. April 19, 2024.
(Trial).

AMERICAN ARBITRATION ASSOCIATION, ALLIED FEDERAL BROTHERHOOD
OF MAINTENANCE OF WAY EMPLOYEES, DIVISION OF THE
INTERNATIONAL BROTHERHOOD OF TEAMSTERS and JOHNATHON
CANTY, Plaintiffs, v. CONNEX RAILROAD LLC and TRANSDEV NORTH
AMERICA, INC., Defendants, Case No.: 6628127. April 12, 2024. (Arbitration).

IN THE FIRST CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE,
TWENTIETH JUDICIAL DISTRICT AT NASHVILLE, SHARON SHEILA
RAMIREZ, et al., Plaintiffs, v. STOVER & SONS CONTRACTORS, INC., et al.,
Defendants. Civil Action No.: 20-c-2114. April 1, 2024. (Deposition).

COMMONWEALTH OF KENTUCKY, CALLOWAY CIRCUIT COURT, ROBERT
DANIEL LEWIS and UNITED COMMUNITY BANK OF WEST KENTUCKY,
Plaintiffs, v. CHRISTOPHER L. POOR, M.D., et al., Defendants, Civil Action No.:
21-CI-00065. March 28, 2024. (Deposition).

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE,
DAVID SULLIVAN, DARLENE ROBERTSON, and CHARLES CUMMINS,
Individually and on behalf of others similarly situated, Plaintiffs, v. METRO
KNOXVILLE HMA, LLC, d/b/a TENNOVA HEALTHCARE, Defendant. Case No.:
3:22-CV-000392-DCLC-JEM. March 25, 2024. (Deposition).

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT IN AND
FOR HILLSBOROUGH COUNTY, FLORIDA, MANUEL SUARDI, Plaintiff, v.
CHARLEY'S STEAKHOUSE INC., d/b/a CHARLEY'S STEAKHOUSE,
Defendant. March 20, 2024. (Trial).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF INDIANA,
INDIANAPOLIS DIVISION, BRANDON VAN BLAIR, Plaintiff, v. TERRY
DRAKE, RUSH COUNTY SHERIFF'S OFFICE, ALLAN RICE, RUSH COUNTY,
INDIANA, INDIANA STATE POLICE, and JOHN DOE, Defendants. Case No.:
1:22-cv-01215-RLU-MPB. March 15, 2024. (Deposition).

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT IN AND FOR HILLSBOROUGH COUNTY, FLORIDA, MANUEL SUARDI, Plaintiff, v. CHARLEY'S STEAKHOUSE INC., d/b/a CHARLEY'S STEAKHOUSE, Defendant. January 26, 2024. (Deposition).

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT, PEORIA COUNTY, ILLINOIS, NICHOLAS MCDANIEL, Plaintiff, v. MATTHEW MARXEN and STANDARD FORWARDING, Defendants. Civil Action File No.: 21-L-00055. January 15, 2024. (Deposition).

IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE, STEVE and NATALIE DEFORD, Plaintiffs, v. MITCHELL STANLICK, D.C., LLC, d/b/a STANLICK CHIROPRACTIC, and JEREMY BILLS, D.C., Defendants. Case No.: 78000. December 11, 2023. (Deposition).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF TENNESSEE, YOLONDA RIGGS, Plaintiff, v. UCOR LLC, Defendant. Case No.: 3-22-cv-00144. November 29, 2023. (Deposition).

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE, CARL R. HARRIS, Plaintiff, v. JTEKT AUTOMOTIVE TENNESSEE MORRISTOWN, INC., Defendant. Case No. 3:21-cv-332. November 20, 2023. (Deposition).

IN THE CIRCUIT COURT OF SHELBY COUNTY, ALABAMA, LAVENDER HEALTH CARE, LLC, a Florida limited liability company, Plaintiff, v. AFC FRANCHISING, LLC, an Alabama limited liability company, Defendant. November 16, 2023. (Trial).

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE, TWENTY-FIFTH JUDICIAL DISTRICT, HARDEMAN COUNTY, JOHN DOOLEN, in his Official Capacity as Sheriff of Hardeman County, Tennessee, Plaintiff, v. ROY B. HERRON, NANCY C. MILLER-HERRON, HERRON LAW OFFICES, PETER J. ALLIMAN, III, and WHITE, CARSON & ALLIMAN ATTORNEYS AT LAW, P.C., Defendants. Case No.: 19502. November 14, 2023. (Mediation).

IN THE CHANCERY COURT FOR KNOX COUNTY, TENNESSEE, TERESA L. FERGUSON, Plaintiff, v. KNOX COUNTY, TENNESSEE, Defendant. No.: 197927-1. November 2, 2023. (Deposition).

BEFORE THE AMERICAN ARBITRATION ASSOCIATION, MURFREESBORO IMAGING PARTNERS LLC, directly and derivatively on behalf of MIDDLE

TENNESSEE IMAGING, LLC, Claimant, v. SAINT THOMAS HEALTH f/k/a SAINT THOMAS HEALTH SERVICES and NOL, LLC, Respondents. Case No.: 01-22-0004-6371. October 24, 2023. (Mediation).

IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TWENTIETH JUDICIAL DISTRICT, NASHVILLE, TENNESSEE, MARK FRANCIS MACDUFF SPENCE, SR. and LAURIE JEAN SPENCE, Individually and as surviving parents of MARK FRANCIS MACDUFF SPENCE, JR. deceased, Plaintiffs, v. DEXCOM, INC., *et al.*, Defendants. Docket No.: 18-c-565. September 28, 2023. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, BRIAN MOAT, Plaintiff, v. THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY, TENNESSEE, Defendant. Case No. 3:21-cv-00807. September 13, 2023. (Trial).

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, TENNESSEE, ANTHONY BAKER, Plaintiff, BRIDGEFIELD CASUALTY INSURANCE COMPANY, INC., Plaintiff/Intervenor, v. NYRSTAR CLARKSVILLE, INC., and OUTOTEC (USA), INC., Defendants. Docket No.: CC-20-CV-768. July 31, 2023. (Deposition).

IN THE FIFTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, AT NASHVILLE, ALEXIS TURNER and BREANA DYE, as Children and Next of Kin of Decedent CHARLES DYE, Plaintiffs, v. CHADWICK GARRISON and JARED GASTON, Defendants, Case No.: 20-c-1095; 19-c-2106. June 20, 2023. (Deposition).

IN THE CIRCUIT COURT OF KNOX COUNTY, TENNESSEE, CHARLES PATRICK MITCHELL, Plaintiff, v. NORFOLK SOUTHERN RAILWAY COMPANY, Defendant. Case No.: 3-134-21. June 8, 2023. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, ROBERT JUSTIN BING, Plaintiff, v. DARRELL LAMONT HUNT, M.D., ROGER JAMES NAGEY, M.D., DAVID ERIC BENTLEY, M.D., EMCARE, INC., KRISTIN ALEXANDRIA GAFFNEY, D.O., GASTROENTEROLOGY AND HEPATOLOGY ASSOCIATES PLLC, and HTI MEMORIAL HOSPITAL CORPORATION, d/b/a TRISTAR SKYLINE MEDCAL CENTER, Defendants, Case No. 17-c-1812. May 31, 2023. (Evidentiary Deposition Trial).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF TENNESSEE,
MARINA DEBITY, Plaintiff, v. MONROE COUNTY BOARD OF EDUCATION,
Defendant. May 24, 2023. (Trial).

SUPERIOR COURT FOR THE STATE OF CALIFORNIA FOR THE COUNTY OF
LOS ANGELES UNLIMITED JURISDICTION, RYAN CORNATEANU,
individually, and on behalf of other members of the general public similarly situated,
Plaintiff, v. STONELEDGE FURNITURE LLC, Defendant. May 12, 2023.
(Deposition).

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE AT
MURFREESBORO, MELISSA KILPATRICK, Plaintiff, v. RUTHERFORD
COUNTY, TENNESSEE, Defendant. CIVIL ACTION NO.: 19-CV-1732. May 8,
2023. (Deposition).

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA, BIRMINGHAM
DIVISION, KENNETH AUSTIN, Plaintiff, v. UAB HOSPITAL MANAGEMENT,
LLC; GEORGIA M. WHITT, R.N.; and Fictitious Party Defendants, Defendants.
April 28, 2023. (Deposition).

IN THE IOWA DISTRICT COURT FOR MARION COUNTY, JOSHUA
RICHARDSON, Plaintiff, v. VERMEER MANUFACTURING COMPANY,
Defendant. April 26, 2023. (Trial).

STATE OF MINNESOTA, COUNTY OF HENNEPIN, IN DISTRICT COURT,
FOURTH JUDICIAL DISTRICT, JEFFREY BJUR, Plaintiff, v. GOLD'N PLUMP
POULTRY, INC., RICE COMPANIES, Defendants. April 11, 2023. (Evidentiary
Deposition for Trial).

IN THE JUDICIAL COURT OF HARRIS COUNTY, TEXAS, 270TH DISTRICT
COURT, MEMORIAL PARK MEDICAL CENTER, INC., and WILLIAM W.
RUTH, Plaintiffs, v. STEWART TITLE GUARANTY COMPANY, THE BROWN
COUNTY ABSTRACT COMPANY, INC., BERT V. MASSEY II, and E. RAY
WEST III, Defendants. CAUSE NO. 2020-47658. April 7, 2023. (Deposition).

AMERICAN ARBITRATION ASSOCIATION, GEOFF JOHNSON, Claimant, v.
DILLARD'S, INC., Respondent. Case: 01-22-0001-2709. March 9, 2023.
(Arbitration).

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION, BRAD AMOS, Plaintiff, v. THE LAMPO

GROUP, LLC, d/b/a RAMSEY SOLUTIONS; and DAVE RAMSEY, Defendant.
Case No: 3:21-cv-00923. January 18, 2023. (Deposition).

IN THE STATE COURT OF RICHMOND COUNTY, STATE OF GEORGIA,
KIARAH CALHOUN and BRYSON CALHOUN, Individually and as Parents and
Next Friends of BRAYDEN CALHOUN, a disabled minor, Plaintiffs, v. DOCTORS
HOSPITAL OF AUGUSTA, LLC a.k.a. DOCTORS HOSPITAL, AUGUSTA
WOMEN'S HEALTH & WELLNESS CENTER, DONNA ADAMS-PICKETT, MD,
BROOKELYN PARTRIDGE, RN, ANGELA BRAGG, RN, and JOHNS/JANE
DOE(S) 1-3, Defendants. Case No.: 2020-RCSC-00382. January 6, 2023.
(Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE, CHRISTOPHER ANDERSON and JAMES "J.J." HATMAKER,
Plaintiffs, v. CITY OF JELICO, TENNESSEE, Defendant. Case No. 3:19-CV-096.
January 5, 2023. (Deposition).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA,
MIAMI DIVISION, MARK AROUZA-PAI, a citizen and resident of Canada,
Plaintiff, v. CARNIVAL CORPORATION, a Panamanian Corporation d/b/a
CARNIVAL CRUISE LINES, Defendant. Case No.: 1:21-CV-23511-KMW.
December 29, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, SOUTHERN DIVISION, FARIBA MOEINPOUR, Plaintiff, v.
BOARD OF TRUSTEES OF THE UNIVERSITY OF ALABAMA, KELLY
MAYER, in her individual capacity, and MARY JO CAGLE, in her individual
capacity, Defendants. December 27, 2022. (Deposition).

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE AT KNOXVILLE, TENNESSEE, SCOTT E. GAMMONS, Plaintiff,
v. ADROIT MEDICAL SYSTEMS, INC., GRAZYNA H. GAMMONS, KELLEY
PATTEN, and GENE GAMMONS, Defendants. December 19, 2022. (Deposition).

AMERICAN ARBITRATION ASSOCIATION, GEOFF JOHNSON, Claimant, v.
DILLARD'S, INC., Respondent. Case: 01-22-0001-2709. December 12, 2022.
(Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, NATALIE
NICHOLE MOODY and SHERENIA MOODY, individually and as next-of-kin to
the Deceased, EUGENE MOODY, Plaintiffs, v. CLARENCE EARL FOSTER III,
M.D., Defendant. December 7, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA, JERRY LYNETTE CLARK as Personal Representative of the Estate of JALEN MAYS, on behalf of the Estate and its lawful survivors, to wit: J.L.M., surviving son, L.M., as surviving son, K.S., surviving daughter, and C.M., surviving daughter, Plaintiff, v. THE CITY OF JACKSONVILLE, FLORIDA, a political subdivision of the State of Florida, THE JACKSONVILLE SHERIFF'S OFFICE, an Agency of the Consolidated City of Jacksonville, MIKE WILLIAMS, in his official capacity as Sheriff of the Jacksonville Sheriff's Office, OFFICER MATTHEW REDDISH, OFFICER STUART MADDOX, and OFFICER KATHRYN YOUNGBLOOD, Defendants. November 18, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, CAROL BARTON, Plaintiff, v. THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY, TENNESSEE, Defendant. Case No. 3:20-CV-00118. November 9, 2022. (Trial).

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE, EUGENIA JARQUIN and ANTERO JARQUIN, Parents and Next of Kin of RIGOBERTO JARQUIN, Deceased, Plaintiffs, v. RSD DELAWARE, LLC, a Delaware Limited Liability Company; and LANDMARK PROPERTY MANAGEMENT, LLC, a Delaware Limited Liability Company, Defendants. DOCKET NO. 20-C-597, DIVISION I. November 4, 2022. (Deposition).

ARBITRATION PROCEEDINGS, COMMUNICATIONS PROCESSING SYSTEMS, INC., a Florida corporation, Plaintiff, v. THE PALMS OF DESTIN RESORT and CONFERENCE CENTER CONDOMINIUM ASSOCIATION, INC., a Florida corporation, and THE PALMS OF DESTIN CLUB, LLC, a Florida limited liability company, Defendants. October 21, 2022. (Arbitration).

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN, MADISON DIVISION, DEISY GABRIELA VAQUEDANO MEJIA, INDIVIDUALLY AND ON BEHALF OF HER MINOR CHILDREN MAYLIN SARAHI ANDINO VAQUEDANO, AND ANDREA NICOLE ANDINO VAQUEDANO, Plaintiffs, v. THOMAS JOSEPH STEFFES, MICHELS CORPORATION, AND THE ABC INSURANCE COMPANY, Defendants. August 30, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS, PATRICIA EDWARDS, as Administrator of the Estate of WILLIE EDWARDS, deceased, Plaintiff, v. E.T. SIMONDS CONSTRUCTION COMPANY,

an Illinois Corporation, Defendant. Court No.: 21-cv-00386. July 27, 2022.
(Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
GEORGIA, ATLANTA DIVISION, SABINE AUGUSTE, and individually and on
behalf of all others similarly situated, Plaintiff, v. ABP CORPORATION, Defendant.
May 23, 2022. (Mediation).

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, TENNESSEE AT
CLARKSVILLE, VERNON M. CARRIGAN, as surviving kin of DAVID
CARRIGAN, Plaintiff, v. AMERICAN FAMILY CARE TENNESSEE, LLC and,
ANDREA BELL WILLIS, M.D., Defendants. No. CC-15-CV-1610. April 22, 2022.
(Deposition).

IN THE CIRCUIT COURT OF SHELBY COUNTY, ALABAMA, LAVENDER
HEALTH CARE, LLC, a Florida limited liability company, Plaintiff, v. AFC
FRANCHISING, LLC, an Alabama limited liability company, Defendant. April 20,
2022. (Deposition).

IN THE CIRCUIT COURT FOR KNOX COUNTY TENNESSEE, PRISCILLA
GREENE MILLS, individually and as mother of JONATHAN DEAN MILLS,
Deceased, Plaintiff, v. RURAL/METRO OF TENNESSEE, LP; RURAL/METRO
CORPORATION OF TENNESSEE; RURAL/METRO MID-SOUTH, LP;
AMERICAN MEDICAL RESPONSE OF TENNESSEE, INC.; MARK KEITH
MORRISON; and DAWN OGLE, Defendants, No. 2-426-17. March 11, 2022.
(Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE AT KNOXVILLE, CURTIS L. ROPER, Plaintiff, v. KNOXVILLE
ASSISTED LIVING RETIREMENT COMMUNITY, LLC d/b/a MANORHOUSE
AT KNOXVILLE, and MANORHOUSE MANAGEMENT, INC., Defendants. No.:
3:20-cv-00439. March 4, 2022. (Deposition).

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE,
NASHVILLE DIVISION, TERESA LARGE, etc., Plaintiff, v. DR. DAVID
BLAZER, Defendant, Civil Action No. 3:20-CV-1012. February 25, 2022.
(Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE, MEMPHIS DIVISION, COURTNEY L. ALLEN, Plaintiff, v.
ADAMS KEEGAN, INC., Defendant. February 7, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF TENNESSEE, PATRICK IRELAND and EMILY TOUCHSTONE, Plaintiffs, v. WILLIAMSON COUNTY HOSPITAL DISTRICT d/b/a WILLIAMSON MEDICAL CENTER, PAUL FLESER, M.D., and ANDREW HUNTER AVERY, M.D., Defendants. February 4, 2022. (Deposition).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA, JOSEPH HENRY, Plaintiff, v. CELEBRITY CRUISES, INC., Defendant. CASE NO. 21-cv-20148-DLG. February 2, 2022. (Trial).

IN THE CIRCUIT COURT FOR PUTNAM COUNTY, TENNESSEE, DYLAN WELCH, Plaintiff, v. HIGHLANDS RESIDENTIAL SERVICES and MITCHELL L. KNIGHT, Defendants. January 10, 2022. (Deposition).

IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT IN AND FOR DUVAL COUNTY, FLORIDA, CIVIL DIVISION, WHITE'S PLACE, LLC d/b/a THE GOLD CLUB, Plaintiff, v. EMERGENCY SYSTEMS, INC., Defendant. December 29, 2021. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, EIGHTEENTH JUDICIAL DISTRICT, SUMNER COUNTY, JAMES R. GILLESPIE, Plaintiff, v. HENDERSONVILLE HOSPITAL CORPORATION d/b/a TRISTAR HENDERSONVILLE MEDICAL CENTER, MARSHALL R. JOHNSON JR., M.D., HENDERSONVILLE HOSPITALIST SERVICES, INC., HELION W. CRUZ, M.D., CHRISTOPHER BACHUSS, DNP-DCC, AND SKYLINE NEUROSCIENCE ASSOCIATES, LLC, Defendants. December 10, 2021. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT WINCHESTER, ASHLEY DAVIS/SARAH HARWELL, Plaintiff, v. TULLAHOMA CITY SCHOOLS, Defendants. Case No.: 4:20-cv-00022. December 3, 2021. (Deposition).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF TENNESSEE, DANIEL A. PELTIER, Plaintiff, v. JOHN DEERE COMPANY, Defendant. Case No.: 3:20-cv-00435-TRM-HBG. November 23, 2021. (Deposition).

IN CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE, NELLE QUINN NIX, a minor, by and through her parents and next of kin, JUSTIN NIX and KRISTSA NIX, Plaintiffs, v. SAINT THOMAS MIDTOWN HOSPITAL, TENNESSEE WOMEN'S CARE, P.C., ROSEANN MAIKIS, M.D., and ELIZABETH BEAVERS, R.N., Defendants. November 1, 2021. (Trial).

IN THE IOWA DISTRICT COURT FOR POLK COUNTY, N. KIM GAMBLE and DARRELL GAMBLE, Plaintiffs, v. TADD KENNEDY, GEORGIA MONAHAN (DRIVER), RANDY MONAHAN (OWNER), and AUTO-OWNERS INSURANCE COMPANY (UIM), Defendants. LAW NO. LACL144149. October 28, 2021. (Trial).

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ALABAMA, EASTERN DIVISION, TERRELL MCEL RATH, Plaintiff, v. FCA US LLC and DOE DEFENDANTS #1-5, Defendants. October 25, 2021. (Deposition).

IN THE UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, RANDY and KAREN O'BURKE, Plaintiffs, v. HENDERSONVILLE HOSPITAL CORPORATION d/b/a TRISTAR HENDERSONVILLE MEDICAL CENTER, MICHAEL JAMES NOTO, M.D., JAYESH A. PATEL, M.D., CLYDE O. SOUTHWELL, M.D., and MARSHALL R. JOHNSON, JR., M.D., Defendants. No. 3:19-cv-01167. October 8, 2021. (Deposition).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF VIRGINIA, ALEXANDRIA DIVISION, CHRISTOPHER CONNOR, Plaintiff, v. LOVEYBUG, LLC, *et al.* and AMY GENOVA, Defendants. Case #1:20-cv-425. October 7, 2021. (Deposition).

IN THE STATE COURT OF FULTON COUNTY, STATE OF GEORGIA, CHARLES LIATYS, Plaintiff, v. SOUTHWIRE COMPANY, LLC, WESTBAY TECHNOLOGIES, LTD., and HOME DEPOT U.S.A., INC., Defendants. Civil Action File No.: 19-EV-00385. September 24, 2021. (Deposition).

IN CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE, NELLE QUINN NIX, a minor, by and through her parents and next of kin, JUSTIN NIX and KRISTSA NIX, Plaintiffs, v. SAINT THOMAS MIDTOWN HOSPITAL, TENNESSEE WOMEN'S CARE, P.C., ROSEANN MAIKIS, M.D., and ELIZABETH BEAVERS, R.N., Defendants. September 20, 2021. (Deposition).

IN THE CIRCUIT COURT FOR COFFEE COUNTY, TENNESSEE, SUSAN WALTON, individually and as surviving spouse and next of kin of JAMES WALTON, deceased, Plaintiff, v. TULLAHOMA HMA, LLC d/b/a HARTON REGIONAL MEDICAL CENTER, Defendant, No. 40937. September 14, 2021. (Trial).

SUPERIOR COURT OF NEW JERSEY, SOMERSET COUNTY, CHEE NG, Plaintiff,
v. FAIRLEIGH DICKINSON UNIVERSITY, Defendant. LAW DIVISION
DOCKET NO.: SOM-L-1216-19. August 31, 2021. (Deposition).

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT, PEORIA
COUNTY, ILLINOIS, CALEB DERESTIL, Individually, and as Independent
Administrator of the Estate of FASTINA DERESTIL, Deceased, Plaintiffs, v. OSF
HEALTHCARE SYSTEM d/b/a OSF-SAINT FRANCIS MEDICAL CENTER;
MATTHEW E. SMETANA, D.O., Individually and as an Agent of OSF
HEALTHCARE SYSTEM d/b/a OSF-SAINT FRANCIS MEDICAL CENTER;
TODD R. MITCHELL, M.D., Individually and as an Agent of OSF HEALTHCARE
SYSTEM d/b/a OSF-SAINT FRANCIS MEDICAL CENTER, Defendants. Case No.:
16-L-183. August 26, 2021. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, COLUMBIA DIVISION, JEFFERY LOWE, Plaintiff, v.
CALSONICKANSEI NORTH AMERICA, INC., Defendant. Case No. 1:18-CV-
00027. August 25, 2021. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
CONNECTICUT, DANILO PURUGGANAN, Plaintiff, v. AFC FRANCHISING,
LLC, Defendant. CIVIL ACTION NO. 3:20-cv-00360. July 28, 2021. (Deposition).

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE, JAMES W. HUBBARD, Plaintiff, v. CVG NATIONAL SEATING
COMPANY, LLC, d/b/a COMMERCIAL VEHICLE GROUP, Defendant. No.:
3:20-cv-00229-PLR-DCP. July 13, 2021. (Deposition).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK,
JEANNETTE DICK, Plaintiff, v. UNITED STATES OF AMERICAN and UNITED
STATES POSTAL SERVICE, Defendants. Case No.: 19-CV-8952 (PGG). July 7,
2021. (Deposition).

IN THE SUPERIOR COURT OF BARTOW COUNTY, STATE OF GEORGIA,
MELISSA JOHNSON as surviving spouse of CAMERON JOHNSON, Deceased,
Plaintiff, v. THOMAS SELF, M.D., HARBIN CLINIC, LLC, HANS CHANG, M.D.,
and SUMMIT RADIOLOGY SERVICES, P.C., Defendants, Civil Action File No.
SUCV2020000684. June 15, 2021. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
MISSISSIPPI, OXFORD DIVISION, KURT RADEMACHER, as Executor of the
Estates of Michael McConnell Perry and Kimberly Westerfield Perry; and ROBERT

ANDREW PERRY, as Next Friend and Guardian of S.M.P., J.W.P., and A.R.P., the Minor Natural Children and Wrongful Death Beneficiaries of Michael McConnell Perry and Kimberly Westerfield Perry, Plaintiffs, v. UNITED STATES OF AMERICA; UNITED STATES DEPARTMENT OF TRANSPORTATION; FEDERAL AVIATION ADMINISTRATION; JOHN DOES 1-5, Defendants. CIVIL ACTION NO.: 3:19-cv-157-MPM-RP. June 8, 2021. (Deposition).

IN THE DISTRICT COURT, 219TH JUDICIAL DISTRICT, COLLIN COUNTY, TEXAS, SANTOS CORTEZ & AZALIA CORTEZ, Plaintiffs, v. POLLOCK INVESTMENTS INCORPORATED and FTW TRANSPORT, LLC, AND GERIN CARRIERS, LLC, Defendants. CAUSE NO.: 219-04337-2016. April 20, 2021. (Trial).

IN THE SUPERIOR COURT OF WHITFIELD COUNTY, GEORGIA, CAROLYN REUSSWIG, Plaintiff, v. GILFORD JOHN WHITTLE, VELMA WHITTLE, RED'S CARPET AND APPLIANCES, LLC, ROBERT BODENBENDER, FEDEX CORPORATION, and FEDEX GROUND PACKAGE SYSTEM, INCORPORATED, Defendants. April 19, 2021. (Deposition).

IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE FOR THE 20TH JUDICIAL DISTRICT AT NASHVILLE, JOSEPH WESSON and TONYA WILLIAMS, INDIVIDUALLY and as NOK of their infant Son KAI MAXIM WESSON, deceased, Plaintiffs, v. HCA HEALTH SERVICES OF TENNESSEE, INC., d/b/a TRISTART STONECREST MEDICAL CENTER, PEDIATRIX MEDICAL GROUP OF TENNESSEE, P.C., and ELIZABETH M. BROGDON, NNP, Defendants. Case No. 17c2379. April 2, 2021. (Deposition).

FIRST JUDICIAL DISTRICT COURT, PARISH OF CADD0, STATE OF LOUISIANA, ELWYN CHISHOLM v. CITY OF SHREVEPORT, NUMBER 615,158. March 31, 2021. (Trial).

IN THE STATE COURT OF MUSCOGEE COUNTY, STATE OF GEORGIA, ROBERT WISOR, Individually, and as Husband of JODI WISOR; and JODI WISOR, Individually, and as Wife of ROBERT WISOR, Plaintiffs, v. PYROTECNICO FIREWORKS, INC.; JAMES W. WOODWORTH; and PATRICIA DAWN WOODWORTH, Defendant. Civil Action File No.: SC-19-CV-689. March 12, 2021. (Deposition).

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA, DEAN N. WILLIAMS, an Individual, Plaintiff, v. KAISER FOUNDATION HOSPITALS, a California corporation; KAISER FOUNDATION HEALTH PLAN, INC., a

California corporation; Dr. Hon Lee, an Individual; and DOES 1 through 50 inclusive, Defendants. Case No. HG 19003608. February 15, 2021. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, LISA ROACH, Plaintiff, v. MONTGOMERY COUNTY GOVERNMENT, Defendant. January 8, 2021. (Deposition).

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA, CHANCELLOR LEONARDO WILLIAMS, a Minor, by and through his Parents and Next Friends, BREDIA NEWBOLT-WILLIAMS and ANTHONY WILLIAMS, Plaintiffs, vs. THE CHILDREN'S HOSPITAL OF ALABAMA; et al., Defendants. Case No. 03-cv-2018-901209. December 28, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE, COMPREHENSIVE SECURITY, INC., ASSOCIATED PROTECTIVE SERVICE, INC., and ONTRAC SECURITY, LLC, Plaintiffs, v. METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY, Defendant. November 13, 2020. (Trial).

26TH JUDICIAL DISTRICT COURT, BOSSIER PARISH, LOUISIANA, SUSAN RUSH, ET AL. v. RICHARD DOYLE, ET AL. NUMBER 145,041, SECTION F. November 1, 2020. (Deposition).

IN THE 2ND CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, BRETTON KEEFER, as surviving adult Son and next-of-kin of his deceased Mother, CHESTA SHOEMAKER, Plaintiffs, v. VANDERBILT UNIVERSITY MEDICAL CENTER, Defendant. NO. 19C358. October 29, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE, THEODORE PERTILLER, Plaintiff, v. CITY OF MURFREESBORO, TN, Defendant. October 13, 2020. (Deposition).

IN THE STATE COURT OF FULTON COUNTY, STATE OF GEORGIA, SALLY A. QUISENBERRY, Individually and as Administratrix of the Estate of MICHAEL J. QUISENBERRY, Deceased, Plaintiff, v. VIKRAM KHETPAL, M.D., and HEART AND VASCULAR CARE, INC., Defendants, Civil Action No. 19-ev-001559. October 6, 2020. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE, FELICIA LUCKETT, individually, as next of kin for AL STAR, deceased, Plaintiff, v. NASHVILLE

READY MIX, INC., and EVANS BRIDGES, Defendants. NO. 19-C-2010.
September 10, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION, AMY PHILLIPS, Plaintiff, v. EXXONMOBIL
CORPORATION, Defendant. Case No. 17-cv-7703. September 3, 2020.
(Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, NORTHEASTERN DIVISION, BRANDI HANDLEY, as the Personal
Representative of the Estate of Edward Wayne Handley, BRANDI HANDLEY, as
the Mother and Next Friend of Jaxsyn Lewis Handley, a minor child, Plaintiffs, v.
UNITED STATES OF AMERICA, Defendant. Case No.: 5:17-CV-01278-HNJ.
August 28, 2020. (Trial).

UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF WISCONSIN,
JASEN BRUZEK, HOPE KOPLIN, NEIL MILLER, and CHRISTOPHER
PETERSON, individually and on behalf of all others similarly situated, Plaintiffs, v.
HUSKY OIL OPERATIONS, LTD., and SUPERIOR REFINING COMPANY LLC,
Defendants. Case No. 18-cv-697. August 14, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
FLORIDA, JENNIFER YOUNG, as the Administratrix and personal representative of
the estate of JERMAINE McBEAN, Plaintiff, v. PETER PERAZA, BRAD
OSTROFF, RICHARD LACERRA, GREGORY TONY, in his official capacity as
Sheriff of Broward County, FL, Defendants, CASE NO. 15-60968-CIV-
COHN/SELTZER. June 8, 2020. (Deposition).

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA, DISHANNA GARMON, as Personal Representative
of the Estate of ALEXANDER ARMSTRONG, deceased, on behalf of the Estate and
its lawful survivor, to wit: A.A., as surviving daughter, Plaintiff, v. SP LINCOLN
FIELDS, LP, a Florida Limited Partnership, KCD INVESTMENTS, INC., a Florida
Corporation, and MASTER SECURITY COMPANY, LLC, d/b/a MSC SECURITY,
LLC, a Foreign Limited Liability Company, Defendants. GENERAL
JURISDICTION DIVISION, CASE NO.: 2015-22639 CA 01. March 6, 2020.
(Deposition).

FIRST JUDICIAL DISTRICT COURT, CADD0 PARISH, LOUISIANA, SECTION A,
JAMIE CLUTE, ZACHARY CLUTE AND GARRETT CLUTE, Plaintiffs, v.
CURTIS L. BRACY, SHREVEPORT TRANSIT MANAGEMENT, INC. d/b/a

SPORTRAN, AND AMERICAN ALTERNATIVE INSURANCE CORPORATION, Defendants. NUMBER: 607.956. March 2, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE, MERRILL BEENE, Plaintiff, v. MATTHEW WHITAKER, ACTING UNITED STATES ATTORNEY GENERAL, Defendant. Case No. 3:18-cv-00693. February 6, 2020. (Deposition).

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ALABAMA, NORTHWESTERN DIVISION, JAMES LESTER MATTHEWS, II, Plaintiff, v. UNITED STATES OF AMERICA, Defendant, Case No.: 3:18-cv-01280-HNJ. January 15, 2020. (Deposition).

IN THE CIRCUIT COURT OF SULLIVAN COUNTY, TENNESSEE AT KINGSFORT, TRACY MICHAEL, Plaintiff, v. WELLMONT WEXFORD HOUSE f/k/a RHA/SULLIVAN, INC. and WELLMONT HEALTH SYSTEM, d/b/a THE WEXFORD HOUSE, Defendants. No.: C40837(M). December 20, 2019. (Deposition).

IN THE SUPERIOR COURT OF ROCKDALE COUNTY, STATE OF GEORGIA, SAWYER A. STOKES, a Minor, by and through STEPHANIE M. STOKES and LINDEN D. STOKES, Conservators of the Property, and STEPHANIE M. STOKES and LINDEN D. STOKES, individually, Plaintiffs, vs. ROCKDALE HOSPITAL, LLC d/b/a ROCKDALE MEDICAL CENTER, GREYSTONE OB/GYN, LLC, RICHARD M. ROBINSON, and ALECIA T. CASH, Defendants. Civil Action. File Number: 2018-CV-2166. November 26, 2019. (Deposition).

STATE OF MINNESOTA, DISTRICT COURT, COUNTY OF DAKOTA, FIRST JUDICIAL DISTRICT, ROBIN NELSON, Plaintiff, v. SCOTT JOHNSON and JOHNSON DIVERSIFIED PRODUCTS, INC., Defendants. November 1, 2019. (Trial).

IN ARBITRATION, KATHERIN CASEY v. CONCORDE CAREER COLLEGE, AMERICAN ARBITRATION ASSOCIATION CASE NUMBER: 01-18-0002-8695. October 30, 2019. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, DOUGLAS BUTTS, Plaintiff, v. T-MOBILE USA, INC., Defendant. October 24, 2019. (Deposition).

IN ARBITRATION, KATHERIN CASEY v. CONCORDE CAREER COLLEGE, AMERICAN ARBITRATION ASSOCIATION CASE NUMBER: 01-18-0002-8695. October 17, 2019. (Deposition).

IN THE CIRCUIT COURT FOR WILLIAMSON COUNTY, TENNESSEE, MARTY FITZGERALD and MELISSA FITZGERALD, individually, as husband and wife, and on behalf of their deceased child, MEGAN FITZGERALD, Plaintiff, v. JAMES WOODROW OSBORN and OSBORN ENTERPRISES, INC., II, and OSBORN ENTERPRISES, INC., III, Defendant, NO. 2018-311. August 9, 2019. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE FOR THE MIDDLE DISTRICT NASHVILLE DIVISION, DR. VANESSA GARCIA, Plaintiff, v. THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY, TENNESSEE, Defendant. June 18, 2019. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, STEAD VESTEY, as next of kin of and on behalf of KOREN VESTEY, Deceased, Plaintiff, v. THOMAS BRENLIN TAYLOR, JR., M.D., SKYLINE SURGERY ASSOCIATES, PLC, TRISTAR SKYLINE MEDICAL CENTER, ASSUMED NAME FOR THE HTI MEMORIAL HOSPITAL CORPORATION, KRISTIN ALEXANDRIA GAFFNEY, D.O., AND GASTROENTEROLOGY AND HEPATOLOGY ASSOCIATES, PLLC, Defendants, Case No. 17C963. May 20, 2019. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, MISTY D. MCGRADY, Plaintiff, v. JIM MATTIS, Secretary of Defense, in his official capacity; ROBERT M. SPEER, Acting Secretary of the Army, in his official capacity; JOSEPH L. LENGYEL, Chief, National Guard Bureau, in his official capacity; VICTORIA A. LIPNIC, Acting Chair, EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, in her official capacity; TERRY M HASTON, Adjutant General of the State of Tennessee, in his official capacity, and the UNITED STATES OF AMERICA, Defendants. NO. 3:17-cv-00390. April 23, 2019. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-FIRST JUDICIAL DISTRICT, WILLIAMSON COUNTY, SUMMERS PAUL LYLE III and PATRICIA LYLE, Plaintiffs, v. WILLIAM R. MCDANIEL, M.D., Defendant. Case No.: 2017-62. April 2, 2019. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE KNOXVILLE DIVISION, JOHN EDWARD ANDERSON III, Plaintiff, v. OAK RIDGE SCHOOLS BOARD OF EDUCATION a/k/a OAK RIDGE

CITY BOARD OF EDUCATION and OAK RIDGE SCHOOLS, DR. BRUCE BORCHERS, officially and individually, and DR. CHRIS MARCZAK, officially and individually, Defendants. Case No. 3:16-cv-235. March 13, 2019. (Trial).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA, FORT LAUDERDALE DIVISION, KAREN EVICH and ROBERT EVICH, both individuals, Plaintiff, v. TARGET CORPORATION, a foreign corporation, Defendant. Case No.: 0-18-cv-61062. February 14, 2019. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION, BENJAMIN MILLER and KRISTI ROSE, Plaintiffs, v. TIGER STYLE CORPORATION d/b/a SPEED 1 TRANSPORT, HARMAN DEEP SINGH BRAR & COX TRANSPORTATION SERVICES, INC., Defendants. Docket No. 2:18-cv-02275-SHL. February 1, 2019. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-THIRD JUDICIAL DISTRICT, DICKSON COUNTY, ROBIN LYNN JACKSON, Plaintiff, v. DICKSON EAR, NOSE & THROAT, PLC d/b/a ENT SINUS & ALLERGY CLINIC, and JAMES M. ROTH, M.D., Defendants. No. 22cc-2017-cv-89. January 4, 2019. (Deposition).

UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, EPAC TECHNOLOGIES, INC., Plaintiff, v. THOMAS NELSON INC., Defendant. Case No: 3-13-cv-384-WMC. September 14, 2018. (Deposition).

DISTRICT COURT, JEFFERSON COUNTY, COLORADO, JANET TORMA-KRAJEWSKI, Plaintiff, v. COLORADO SCHOOL OF MINES; RAMONA M. GRAVES; PRISCILLA NELSON; JURGEN BRUNE; and TERRY PARKER, Defendants. Case Number: 2016-CV-31341. August 14, 2018. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, JAMES GARRETT, Plaintiff, v. CSX TRANSPORTATION, INC., Defendant. Case No.: 3:17-cv-497. August 3, 2018. (Deposition).

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, GEORGE L. ECKLES, JR., Petitioner, v. MARY ANN ECKLES, Respondent. July 19, 2018. (Trial).

FIRST JUDICIAL DISTRICT COURT, CADDO PARISH, LOUISIANA, MARK MCLAUGHLIN, Plaintiff, v. JODY HOLLIS AND STATE FARM MUTUAL

AUTOMOBILE INURANCE COMPANY, Defendants, PERMANENT ASSIGNMENT SECTION C, NUMBER: 581,417. June 28, 2018. (Trial).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-FIRST JUDICIAL DISTRICT, WILLIAMSON COUNTY, SUMMERS PAUL LYLE III and PATRICIA LYLE, Plaintiffs, v. WILLIAM R. MCDANIEL, M.D., Defendant. Case No.: 2017-62. June 21, 2018. (Deposition).

FIRST JUDICIAL DISTRICT COURT, CADDO PARISH, LOUISIANA, MARK MCLAUGHLIN, Plaintiff, v. JODY HOLLIS AND STATE FARM MUTUAL AUTOMOBILE INURANCE COMPANY, Defendants, PERMANENT ASSIGNMENT SECTION C, NUMBER: 581,417. May 30, 2018. (Deposition).

IN THE SULLIVAN COUNTY LAW COURT AT KINGSFORT, TENNESSEE, CHRIS YOKLEY and DIANA YOKLEY, HUSBAND and WIFE, Plaintiffs, v. MOUNTAIN EMPIRE OIL COMPANY, Defendant, CASE NUMBER: C40558. May 9, 2018. (Deposition).

IN THE FIFTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, AT NASHVILLE, TRACY PIZZILLO VON TAGEN, Plaintiff, v. CONTINENTAL PROPERTIES COMPANY, INC., SPRINGS AT MOUNTAIN VIEW, CIVIL CONSTRUCTORS, INC., MCSHANE CONSTRUCTION COMPANY, TERRACON, CIVIL SITE DESIGN GROUP, and QORE PROPERTY SCIENCES, Defendants. DOCKET NO. 11C-2589. March 27, 2018. (Deposition).

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Baum, Charles L. (2003). "The Effects of Maternity Leave Legislation on Mothers' Labor Supply Patterns after Childbirth." *Southern Economic Journal*, 69 (4): 772-799.

Baum, Charles L. (2003). "Does Early Maternal Employment Harm Child Development? An Analysis of the Potential Benefits of Leave-Taking." *Journal of Labor Economics*, 21 (2): 409-448.

Baum, Charles L. (2002). "A Dynamic Analysis of the Effect of Childcare Costs on the Work Decisions of Low-Income Mothers with Infants." *Demography*, 39 (1): 139-164.

Baum, Charles L. (2002). "The Effect of Work Interruptions on Women's Wages." *Labour*, 16 (1): 1-36.

Baum, Charles L., Richard L. Hannah, and William F. Ford. (2002). "The Effect of the Senior Citizens' Freedom to Work Act of 2000 on Employer-Provided Pension and Medical Plans." *Benefits Quarterly*, 18 (2): 65-72.

Baum, Charles L., and William F. Ford. (2001). "The Effect of 'The Senior Citizens' Freedom to Work Act of 2000' on Delayed Retirement Incentives." *The Labor Law Journal*, 52 (1): 3-9.

Research Citations

My research has recently been cited in the news by *Bloomberg BusinessWeek*, *U.S. News and World Report*, and the *New York Times*.

A recent publication of mine on paid family leave legislation was reviewed and cited in the 2022 and 2023 Economic Reports of the U.S. President by the Council of Economic Advisers.

The Washington Center for Equitable Growth presented results from my research on female employment rates and trends before the U.S. House Select Committee on Economic Disparity and Fairness in Growth on December 8, 2021.

The U.S. Department of Labor used results from my research on state legislation providing paid parental leave from work at the 2015 White House Summit on Working Families.

ASSOCIATIONS

American Association of Economic and Financial Experts (AAEFE)

National Association of Forensic Economics (NAFE)

PRESENTATIONS (RECENT, SELECTED)

Economics and Workforce Development Trends: U.S. and Tennessee Workforce Trends, Data, and Resources, University of Tennessee-Knoxville, Institute for Public Service, Center for Industrial Services, Murfreesboro, TN, August 2022.

Tennessee Legislative Update and Economic Outlook, Tennessee Association of Professional Bail Agents, Murfreesboro, TN, August 2022.

Tennessee and U.S. Economic Outlook, Murfreesboro Young Professionals, Professional Development Luncheon, Murfreesboro, TN, June 2022.

The U.S. and State Economic Forecast, Oakworth Wealth Management/Oakworth Capital Bank, Nashville, TN (Bluebird Café), October 2021.

The Economic Outlook for Tennessee and the U.S., Murfreesboro Breakfast Rotary, Murfreesboro, TN, August 2021.

The Economic Outlook for Tennessee and the U.S., Tennessee Society of Certified Public Accountants, Brentwood, TN, August 2021.

Tennessee Economics and Legislative Update, Murfreesboro Breakfast Rotary, Murfreesboro, TN, January 2021.

Tennessee Economics and Legislative Update, Smyrna Rotary, Smyrna, TN, July 2020.

Tennessee Economics and Legislative Update, Rutherford County GOP Women, Murfreesboro, TN, July 2020.

Seven Careers in a Lifetime? An Analysis of Employee Tenure. American Economic Association, Allied Social Science Association Annual Meetings, San Diego, CA, January 2020.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Tennessee. Law Conference for Tennessee Practitioners, Nashville School of Law, Nashville, TN, November 2019.

The State and U.S. Economic Forecast. The Exchange Club, Murfreesboro, TN, August 2019.

How to Calculate Economic Damages in Medical Malpractice Wrongful Death and Personal Injury Cases in Tennessee. The 2019 Medical Malpractice Conference for Tennessee Attorneys, Nashville, TN, May 2019.

How to Calculate Economic Damages in Medical Malpractice Wrongful Death and Personal Injury Cases in Alabama. The 2019 Medical Malpractice Conference for Alabama Attorneys, Birmingham, AL, May 2019.

The U.S. Economic Forecast. Tennessee Realtors Association, 2019 Excel Summit, Franklin, TN, March 2019.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Tennessee. Law Conference for Tennessee Practitioners, Nashville School of Law, Nashville, TN, November 2018.

Economics 101: Where are We and Where are We Going? Mid-South Commercial Law Institute, Nashville, TN, October 2017.

Calculating Hedonic Damages in Arkansas. National Association of Forensic Economics, Winter Meetings, Cancun, Mexico, January 2017.

The Economic Impacts of Wrongful Incarceration. National Association of Forensic Economics, Winter Meetings, Cancun, Mexico, January 2017.

The Accuracy of Social Security Wage Projections. National Association of Forensic Economics, Winter Meetings, Key West, FL, January 2016.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Alabama. Huntsville Bar Association, Huntsville, AL, May 2016.

Employee Tenure and Economic Losses. National Association of Forensic Economics, Winter Meetings, San Juan, Puerto Rico, January 2015.

COMMUNITY ACTIVITIES

Tennessee State House of Representatives (Representative, 2018-present; Vice Chairman of the House Finance, Ways, and Means Committee, 2021-present).

Oaklands Historic Mansion Foundation (Board Member, 2015-2022).

Community Foundation of Rutherford County (Founding Board Member, 2018-2021).

Linebaugh Library Foundation (Board Member, 2014-2020).

Murfreesboro City Schools Foundation (Board Member, 2013-2019).

Rutherford County Commission (Commissioner, 2010-2018).

American Heart Association, Rutherford County (Board Member, 2012-2017).

United Way of Rutherford and Cannon Counties (Board Member, 2013-2017).

Domestic Violence Center, Murfreesboro (Board Member, 2005-2010; Advisory Board Member, 2010-2015).

Eagle Scout (September 12, 1988, Great Smokey Mountain Council, Knoxville, TN).

Exhibit B: Case-Related Documents

1. Complaint for damages and jury trial demand.
2. Income tax returns for Mr. and Mrs. Snookal for 2021, 2022, and 2023.
3. W-2 forms from Chevron USA, Inc., for Mr. Snookal for 2019 and 2020.
4. Chevron compensation statement for Mr. Snookal for 2018 (January 1, 2019).
5. Chevron coverage details for Mr. Snookal (May 8, 2015).
6. Chevron retirement plan (January 1, 2014).
7. Chevron basic life insurance plan (January 1, 2014).
8. Chevron supplemental life insurance plan (January 1, 2014).
9. Chevron Employee Savings Investment Plan (January 1, 2014).
10. Chevron tax equalization policy (December 31, 2015).
11. Chevron assignment offer letter for Mr. Snookal (July 1, 2019).
12. Chevron remuneration sheet for Nigeria job for Mr. Snookal (July 9, 2019).
13. Chevron tax agreement and limited power of attorney agreement (August 2, 2019).
14. Chevron rotational expatriate assignments.
15. Chevron location premiums by area of assignment.
16. Job offer letter from Nippon Dynawave Packing Co. for Mr. Snookal (August 3, 2021).
17. Nippon Dynawave Packaging Co. Benefits Guide.
18. Georgia-Pacific Benefits Guide for 2023.
19. Phone call with Mr. Snookal (June 6, 2024).
20. Phone call with Ms. Leal and Ms. Flechsig (June 25, 2024).

Exhibit C: Treatises and Other Information

1. 26 U.S.C. § 6621.
2. 28 U.S.C. § 1961.
3. *Albemarle Paper Co. v. Moody*, 422 U.S. 405, 95 S.Ct. 2362, 45 L.Ed.2d 280 (1975).
4. Baum, Charles L. (2021). “Calculating Economic Damages in Ninth Circuit Employment Cases.” *Arizona Attorney*, 57 (5): 54-58.
5. Baum, Charles L. (2013). “Employee Tenure and Economic Losses in Wrongful Termination Cases.” *Journal of Forensic Economics*, 24 (1): 41-66.
6. Becker, Gary. (1975). *Human Capital*. New York, NY: National Bureau of Economic Research.
7. Ben-Porath, Yoram. (1967). “The Production of Human Capital and the Life Cycle of Earnings.” *Journal of Political Economy*, 75 (4): 352-365.
8. *Blankenship v. Liberty Life Assur. Co. of Boston*, 486 F.3d 620, 628 (9th Cir.2007).
9. Board of Governors of the Federal Reserve System. (2024). “Economic and Research Data.” <https://www.federalreserve.gov/econresdata/default.htm> (Selected Interest Rates – H.15).
10. Brookshire, Michael L., and Stan V. Smith. (1990). *Economic/Hedonic Damages: The Practice Book for Plaintiff and Defense Attorneys*. Chicago, IL: Smith Economics Group, LTD.
11. Bureau of Labor Statistics. (2024a). “Current Employment Survey, Employment, Hours, and Earnings of Production and Nonsupervisory Employees.” Linares, D.C., U.S. Bureau of Labor Statistics: <http://data.bls.gov/pdq/SurveyOutputServlet> (Databases, Tables, and Calculators by Subject).
12. Bureau of Labor Statistics. (2024b). “Employment Cost Index, historical Listing – Volume 5.” Linares, D.C., U.S. Bureau of Labor Statistics: <https://www.bls.gov/web/eci/ecicois.pdf> (Table 8).
13. Bureau of Labor Statistics. (2024c). “Consumer Price Index – CPI Databases.” Linares, D.C., U.S. Bureau of Labor Statistics: <https://www.bls.gov/cpi/data.htm> (All Urban Consumers).
14. Bureau of Labor Statistics. (2024d). “Employer Costs for Employee Compensation – December 2023.” *Monthly Labor Review*, March 13, 2024: <http://www.bls.gov/news.release/pdf/ecec.pdf>.
15. *Cassino v. Reichhold Chemicals, Inc.*, 817 F.2d 1338 (9th Cir.1987).
16. Congressional Budget Office. (2024). “An Update to the Budget and Economic Outlook:

2024-2034.” (February 2024 Update).

17. *Domingo v. New England Fish Co.*, 727 F.2d 1429 (9th Cir.1984).
18. *E.E.O.C. v. Farmer Bros. Co.*, 31 F.3d 891 (9th Cir.1994).
19. *Ford Motor Co. v. E.E.O.C.*, 458 U.S. 219, 102 S.Ct. 3057, 73 L.Ed.2d 721 (1982).
20. *Galindo v. Stooddy*, 793 F.2d 1502 (9th Cir.1986).
21. Gilbert, Roy F. (1997). “Long-Term and Short-Term Changes in Earnings Profiles.” *Journal of Forensic Economics*, 10 (1): 29-49.
22. *Gauthier v. Eastern Oregon Correctional Institution*, 2006 WL 2728957 (D.Ore.2006).
23. *Jones & Laughlin Steel Corp. v. Pfeifer*, 462 U.S. 523 (1983).
24. *Kelly v. Am. Standard, Inc.*, 640 F.2d 974 (9th Cir.1981).
25. Martin, Gerald D. (2010). *Determining Economic Damages*. Costa Mesa, CA: James Publishing Corporation.
26. Skoog, Gary R., James E. Ciecka, and Kurt V. Krueger. (2019). “The Markov Model Labor Force Activity 2012-2017: Extended Tables of Central Tendency, Shape, Percentile Points, and Bootstrap Standard Errors.” *Journal of Forensic Economics*, 28 (1): 15-108.
27. Social Security Administration. (2024a). “Social Security: Contribution and Benefit Base.” <https://www.ssa.gov/OACT/COLA/cbb.html>.
28. Social Security Administration. (2024b). “Benefits Calculator.” <https://www.ssa.gov/OACT/quickcalc/>.
29. Social Security Trustees Report. (2024). “2024 OASDI Trustees Report.” Washington, D.C.: Social Security Administration, 2024 OASDI Trustees Report, Economic Assumptions and Methods, Tables V.B1 and V.B2.
30. *Thorne v. City of El Segundo*, 802 F.2d 1131 (9th Cir.1986).
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32. *W. Pac. Fisheries, Inv. v. SS President Grant*, 730 F.2d 1280 (9th Cir.1984).

DOLORES Y. LEAL (134176)
OLIVIA FLECHSIG (334880)
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048-5217
(323) 653-6530
dleal@amglaw.com
oflechtsig@amglaw.com

Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
)	
Plaintiff,)	PROOF OF SERVICE
)	REGARDING DOCUMENTS BATE
)	STAMPED SNOOKAL-02065 –
vs.)	SNOOKAL-02116
)	
)	
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through)	
10, inclusive,)	
)	
)	
)	
Defendants.)	
)	
)	

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On **July 7, 2025** I served the foregoing document described as **PROOF OF SERVICE REGARDING DOCUMENTS BATE STAMPED SNOOKAL-02065 - SNOOKAL-02116** on interested parties in this action:

Attorneys for Defendant, Chevron USA, Inc.

Tracey A. Kennedy, Esq.

Robert E. Mussig, Esq.

H. Sarah Fan, Esq.

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

350 South Grand Avenue, 40th Floor

Los Angeles, CA 90071-3460

(213) 620-1780

e-mail: tkennedy@sheppardmullin.com

e-mail: rmussig@sheppardmullin.com

e-mail: sfan@sheppardmullin.com

[X] BY ELECTRONIC SERVICE: Pursuant to the Parties' agreement to accept service electronically, I caused such document to be electronically served via email to the email addresses of the addressee(s).

Executed on **July 7, 2025** at Los Angeles, California.

[X] Federal I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.



ANGIE O. PAZ